Message

From: Andrew Mills [Andrew.Mills@LA.GOV]
Sent: 4/8/2022 8:16:01 PM
To: Chen, Justin [Chen.Justin@epa.gov]
Subject: RE: Sasol inspection next week

Justin,
My phone Number is Ex. 6 Personal Privacy (PP)
Thanks,
Andrew Mills

From: Chen, Justin <Chen.Justin@epa.gov>
Sent: Friday, April 8, 2022 11:45 AM
To: Leathers, James <Leathers.James@epa.gov>; Brian Fontenot <Brian.Fontenot@LA.GOV>
Cc: Andrew Mills <Andrew.Mills@LA.GOV>; Au, Doreen <Au.Doreen@epa.gov>
Subject: RE: Sasol inspection next week

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hello all,

For the Sasol Inspection, Doreen and I will be traveling to Westlake on 4/11 and intend to make entry to the facility on 4/12 at approximately 8 AM.
4/12 – Speak to Sasol staff regarding questions on material balances for ethylene oxide production and emission reports
4/13 – Speak to Louisiana Integrated Polyethylene JV on waste water treatment, potentially tour the WWTP
4/14 – If tour wasn't conducted the prior day, do WWTP tour, then ask any questions and discussion on WWTP

My cell phone is Ex. 6 Personal Privacy (PP) so please feel free to reach out to coordinate further.

Best regards,

Justin Chen
Environmental Engineer, Air Toxics Enforcement Enforcement and Compliance Assurance Division EPA Region 6
1201 Elm St., Suite 500, ECDAT
Dallas, TX 75270
Office: 214-665-2273

From: Leathers, James <Leathers.James@epa.gov>
Sent: Wednesday, April 6, 2022 10:09 AM
To: brian.fontenot@la.gov
Cc: Andrew Mills <Andrew.Mills@LA.GOV>; Chen, Justin <Chen.Justin@epa.gov>
Subject: RE: Sasol inspection next week

Hi Brian,

The EPA on the inspection will be Justin Chen.

Justin please coordinate with Andrew directly, and cc Brian. Thanks

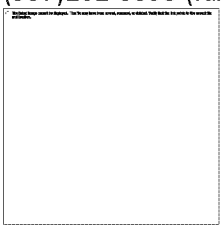
James Leathers

Environmental Engineer
EPA Region 6
Chief, Air Toxics Enforcement Section
Dallas, TX 75270
(214) 665-6569
leathers.james@epa.gov

From: Brian Fontenot <Brian.Fontenot@LA.GOV>
Sent: Wednesday, April 06, 2022 10:00 AM
To: Leathers, James <Leathers.James@epa.gov>
Cc: Andrew Mills <Andrew.Mills@LA.GOV>
Subject: Sasol inspection next week

James,
Could you please provide the contact info. for the EPA lead of the Subject inspection for coordination purposes? I've cc'ed Mr. Andrew Mills who will be accompanying if there's room. Thank you for your swift attention to this matter.

Brian Fontenot, Environmental Scientist Senior - Air
La. Dept. of Environmental Quality
Office of Environmental Compliance
Surveillance Division
111 New Center Dr.
Lafayette, LA 70508
(337) 262-5577
(337) 258-3071 (cell)
(337)262-5593 (fax)



US EPA Region 6 – Site-Specific Health and Safety Plan (HASP)

GENERAL INFORMATION

Facility/Site Name:	**Sasol Chemicals (USA) LLC – Lake Charles Chemical Complex**	
Field Start Date *(MM/DD/YYYY):*	04/11/2022	***Field End Date:*** 04/15/2022
Facility/Site Location: (complete address, if relevant)	2201 Old Spanish Trail, Westlake, LA 70669	
General Description of Site Activities:	Inspection - Clean Air Act inspection of ethylene oxide/ethylene glycol production unit	

EMERGENCY INFORMATION

Non-911 Emergency Phone: (Direct to police, fire, hospital and Facility; include area code)	**Police:** 337-433-4151	**Fire:** 337-436-7417
	Hospital: (337) 527-7034	**Facility/Site:** +13374945301
Medical Facilities: (Name and Address)	West Calcasieu Cameron Hospital 701 Cypress St, Sulphur, LA 70663	
Directions to Local Medical Facilities:	(see attached map with directions)	
Site-Specific Emergency Response Procedures:	If serious, call 911. If not, transport to nearest medical facility. Follow site-specific emergency response procedures provided by on-site personnel prior to entry.	

EPA RESOURCES

	Name	Work Phone	Mobile Phone
Team/Project Leader:	Justin Chen	214-665-2273	Ex. 6 Personal Privacy (PP)
First-Line Supervisor:	James Leathers	214-665-6569	
R6 SHEMP Manager:	Kendra Mask	(214) 665-7225	
Workmen's Comp Manager:	Kendrick Young	(214) 665-7466	

HAZARDS / SAFETY

Applicable JHA(s):	General Industrial Air Inspections & COVID-19 Supplement

Check Potential Hazards:

☐ Radiation	☑ Toxics	☑ Fire/Explosion	☐ Corrosives
☐ O_2 Deficiency	☑ Noise	☑ Physical	☐ Other:
☐ Dusts	☑ Heat/Cold Stress	☐ Biological	

Site Specific Hazard Description: (i.e. potential hazards, routes of entry, quantity of chemicals present, etc.)	Toxics: inhalation hazards from contaminants in production and tanks Noise: Production generated Heat Stress: extreme temperatures Fire/Explosion: production facility and tanks store flammable material Physical: Tour facility with limited mobility
Safety Monitoring Equipment Required: (list equipment)	EPA will follow the facility's safety equipment requirements. EPA will also use a FLIR infrared camera to detect hydrocarbon emissions from production devices, storage tanks, piping, and loading devices.
Prevention:	*All site safety procedures shall be followed. Areas with potential exposure to chemical, physical and explosive hazards shall be avoided if at all possible. Team members shall not enter confined spaces or areas with potential unexploded ordinance. In case of emergency, all inspection staff shall exit and allow site personnel to contain and manage incident.*
Safety Supplies:	Reference attached JHA

Facility/Site Name:	Sasol Chemicals (USA) LLC – Lake Charles Chemical Complex		
Field Start Date:	04/11/2022	***Field End Date:***	04/15/2022

HASP Approval / H&S Certification

This site HASP has been reviewed and constitutes the minimum anticipated safety requirements for personnel engaged in field activities at this project site. NOTE: THE HASP HAS TO BE COMPLETE WITH ATTACHMENTS BEFORE SIGNING.

By signing below, I certify that I have read and understand the JHA applicable to this HASP, have completed all required health and safety training, and possess all required personal protective equipment.

Team and/or Project Leader/ Cell Phone Number	*Signature/ Date:*
Justin Chen / 469-544-8709	JUSTIN CHEN Digitally signed by JUSTIN CHEN DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=JUSTIN CHEN, 0.9.2342.19200300.100.1.1=68001003655847 Date: 2022.01.18 07:22:06 -06'00'

Team Member(s) / Cell Phone Number	*Signature/ Date:*	***Team Member(s) / Cell Phone Number***	*Signature/ Date:*
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By signing below, I certify that I have read and approved this HASP, and have confirmed the team listed above are all current in their H&S training/programmatic requirements as defined in their current JHA(s).

First-Line Supervisor: James Leathers	*Signature/ Date:* JAMES LEATHERS Digitally signed by JAMES LEATHERS Date: 2022.03.29 21:16:30 -05'00'
Health & Safety Officer: Kendra Mask	*Signature/ Date:*

NOTE: ***After approval of the HASP and before departing to the field, the project leader must email a signed PDF copy to each of his/her TEAM MEMBER(s), FIRST-LINE SUPERVISOR, and the SHEMP MANAGER. The project leader must carry and maintain a signed hardcopy in the field and have it accessible for all team members.***

☐ ***HASP DISAPPROVED*** ***For Health & Safety Officer Use Only***

HASP Disapproved

Deficient Area(s): ☐ *HASP Error* ☐ *Training Error* ☐ *Programmatic Error*	
Health & Safety Officer: Kendra Mask	*Signature:* *Date:*

JOB HAZARD ANALYSIS

Hazard (HT)

1. Toxic Chemic
2. Flammable Chemicals
3. Corrosive Chemicals
4. Environmental
5. Explosion (Chemical Reaction)
6. Explosion (Over pressurization)
7. Mechanical/Vibration
8. Electrical (Shock, Short Circuit)
9. Electrical (Fire)
10. Electrical (Static, ESD)
11. Electrical (Loss of Power)
12. Ergonomic (Overexertion)
13. Ergonomic (Human Error)
14. Vibration
15. Fall (Slips/Trips)
16. Fall (To a Different Level)
17. Excavation (Collapse)
18. Fire, Heat, Thermal, Cold
19. Noise
20. Radiation (Ionizing/Non-Ionizing)
21. Visibility
22. Weather
23. Caught (In, On, Between)
24. Struck (By, Against)
25. Driving
26. Confined Space
27. Other

Job Task: General Industrial Air Inspections

Job Frequency/ Duration:
20/year; 1-5 days/site; may conduct several site inspections during one trip

Tools Used:
Digital Camera
FLIR Camera
Portable VOC Detector
Cell Phone
Portable Toxic Vapor Analyzer (borrowed from 6SF)

Chemicals Used:
Span gases for calibration – 10 lb or smaller compressed gas cylinders

CRITICAL TO SAFETY (CTS)

Risk Estimation Matrix

Probability of Occurrence of Harm	SEVERITY OF HARM			
	Catastrophic	Serious	Moderate	Minor
VERY LIKELY	Extreme	High	High	Medium
LIKELY	High	High	Medium	Low
UNLIKELY	Medium	Medium	Low	Negligible
REMOTE	Low	Low	Negligible	Negligible

* High = CTS tasks should receive engineering controls prior to assigning administrative or PPE controls.

FLIR = Forward Looking Infrared
VOC = Volatile organic compound
PPE = Personal protective equipment
MSDS = Material Safety Data Sheet

Job Description: Personnel conduct site inspections at various industrial facilities to determine compliance with federal emission standards, Title V Operating Permits, or Synthetic Minor Operating Permits. Personnel may scan various units using the FLIR camera to determine if leaks/plumes are present. If leaks are observed, personnel approach the unit from upwind to limit potential inhalation exposures. VOC detectors and toxic vapor analyzers may be utilized to confirm presence of certain types of emissions at the source. VOC detectors and vapor analyzers require periodic calibration using standard gases which come in small compressed gas cylinders. Inspections encompass indoor and outdoor site conditions, and include visual observations of operating and non-operating industrial machinery and equipment.

Step #	Procedures (LOP Procedure Step)	Potential Hazards	HT	Check CTS	Required Safe Practice	PPE
1	Pre-inspection: Collect and review available site information and records, coordinate travel, and develop site safety plan.	None	NA	NA	Consider anticipated weather conditions and potential hazards, and determine appropriate attire	NA
2	Deployment: Organize personnel/equipment/supplies; Conduct pre-inspection meeting at Regional Office (RO); Deploy to location either by car or airplane (personnel drive the majority of times).	Ergonomics, Driving, Weather	13, 15, 21, 22, 24, 25, 27	Medium	Careful lifting techniques; situational awareness of wet or uneven ground; secure grip; packing at desk level or higher; drive defensivly; do not text while driving; do not use phone while driving (passenger makes calls or move off road and stop)	Other Body Protection
3	Calibrate Instruments: Prior to site entry, personnel calibrate portable or hand-held VOC detector or toxic vapor analyzer, if such are to be used (conducted off-site to avoid cross contamination). If no portable detectors or analyzers will be used, proceed to step 4.	Pressurized gas cylinders	2, 27	Low	Follow instrument manual instructions and calibration gas MSDSs for proper handling of span gases during detector calibration	NA
4	Site Entry and Observation: Personnel may be requested to complete a short (<30 minutes) on-site facility-specific safety briefing before conducting an opening meeting. In the opening meeting, site-specific documentation, facility layout drawings, diagrams, reports, records and other data are requested for cursory review. Personnel then observe and inspect facility operations following the process flow throughout the site, both inside and outside. Special attention is given to process equipment, tanks, pollution control equipment, piping, drains, storage areas, and treatment systems. Personnel may scan	Poisonous insects or plants, chemicals, thermal/cold stress, noise, vibration, slips/trips/falls, severe weather, operational and/or moving heavy equipment and vehicles, pressurized/cryogenic	1-4, 6, 7, 14, 15, 18, 19, 20, 21, 22, 27	Low	Reference PPE Recommendations table and PPE Hazard Assessment Form	

	v[illegible] piping, or tanks with the FLIR camera from a distance e closer from an upwind direction. If unauthorized e[illegible]ons are noted, personnel document the deficiencies using the FLIR camera, a digital camera, and the VOC detector or toxic gas analyzer. At the conclusion of the site inspection, personnel conduct a closing meeting to communicate deficiencies, identify additional information needs, or request follow up actions.	bulk gas storage ves[illegible] hazardous material storage vessels, hig[illegible] pressure liquid or gas piping systems, non-ionizing radiation from industrial lasers, dust and smoke, noxious odors				
5	Deployment to Next Location: If applicable, personnel drive to next industrial facility and repeat steps 3 & 4 above. If not, personnel proceed to step 6.	Reference Steps 3 & 4				
6	Post-Inspection Return: Upon completion of inspection visit(s), return to RO and proceed with post inspection activities (administrative in nature).	Ergonomics, Driving, Weather	13, 15, 21, 22, 24, 25, 27	Medium	Careful lifting techniques; situational awareness of wet or uneven ground; secure grip; packing at desk level or higher; drive defensively; do not text while driving; do not use phone while driving (passenger makes calls or move off road and stop)	Other Body Protection

HAZAR… ALL POTENTIAL HAZARDS ASSOCIATED WITH THE JOB (CHECK ALL THAT AP…

Physi…						
General	☒	heat	☒	cold	☒	noise
	☒	explosion	☒	fire	☒	weather
	☐	fatigue	☐	violence	☒	illness/injury
Radiation	☐	ionizing	☐	microwave	☐	light
Vehicles	☒	traffic	☒	heavy equip	☒	forklift
	☐	helicopter	☐	small aircraft	☐	boat
Boat Ops	☐	sediment sampling	☐	rapid water	☐	open water
	☐	diving	☐	electrofish		
Industrial	☒	comp gas	☒	electricity	☐	confined space
	☒	equip	☒	moving parts		
Overhead	☐	obstruction	☒	falling objects		
Elevation	☒	roof	☒	scaffold	☒	ladder
	☒	stairs	☒	catwalk		
Slips/trips	☒	terrain	☒	debris	☒	slippery
	☐	trench	☒	pits/holes		
Other physical hazards:			☒	Noxious odors, pressurized vessels, vibration, non-ionizing radiation (lasers)		

…logical						
Agriculture	☐	CAFO	☐	fish	☐	farm anim…
Animals	☒	dogs	☒	feral animals	☒	snakes
Insects	☒	spiders	☒	mosquitoes	☒	wasp/hornet
	☒	bees				
Pathogens	☐	bloodborne	☐	sewage	☐	med/lab
Other Biological:	☒	scorpions, poisonous plants				

Chemical						
Containers	☒	ammonia	☒	chlorine	☒	other
VOCs	☒	solvents	☒	fuel	☒	oils
Wastes and other materials	☐	sewer	☐	landfill	☒	smoke/dust/fume
	☒	metals	☐	PCBs	☒	paints/surfacing
Particulates	☒	fibers	☒	diesel	☐	asbestos
Sampling	☐	acids	☐	bases		
Other Chemicals:	☒	benzene, toluene, ethylbenzene, xylene, sulfides, CO_2, liquid natural gas, methane, ethane, amine solutions, inert/ cryogenic bulk gases, inorganic acids and alkalis, chlorofluorocarbons, organic corrosives, etc				

REQUIRED PERSONAL PROTECTIVE EQUIPMENT (PPE) (CHECK ALL THAT APPLY)

Feet:	☐	safety boots	☒	steel-toe boots	☐	shank
	☐	rubber boots	☐	waders		
Gloves:	☒	leather	☐	cotton	☐	cut-resistant
	☐	chemical resist	☐	disposable		
Body:	☐	safety vest	☐	pfd	☐	harness
	☐	tyvek	☒	flame retardant	☐	coveralls
Eyes:	☒	safety glasses	☒	sunglasses	☐	goggles
Head:	☒	hard hat	☒	hearing protection	☒	respirator

OTHER REQUIRED SAFETY EQUIPMENT/TRAINING

☐	dosimetry	☒	communication	☐	decontamination
☒	first aid kit	☐	fire extinguish	☐	flares
☐	chains/studs	☒	eye wash/shower		

☐	24 hr HAZWOPER	☐	40 hr HAZWOPER	☐	HAZWOPER Annual Refresher
☐	TLD Program	☒	RPP Program	☒	Medical Surveillance
☒	1st Aid/CPR	☒	Other: 1) 24hr EPA H&S Training; 2) 8hr EPA H&S Refresher; 3) Defensive Driving Training (every 3yrs); 4) Respirator Fit test/training		

COMMENTS:

Personnel may be potentially exposed to various chemicals while inspecting process equipment, piping, storage areas, pollution control devices, tanks, and treatment systems. Chemicals may include, but are not limited to: organic chlorinated and non-chlorinated solvents; bulk flammable, combustible, toxic/corrosive, or inert/cryogenic gases; petroleum fuels; petroleum and non-petroleum oil substances; chlorofluorocarbons, inorganic acid and alkaline liquids; metallic and non-metallic mineral solids; and, organic corrosives. Air sampling data is usually not available to document potential inhalation exposures, so personnel should minimize time spent in areas where hazardous materials are stored or used. Physical hazards may include loud noise, dust, smoke, and vibration from heavy equipment and machinery, noxious odors, forklift and other vehicular traffic, and occasionally, non-ionizing radiation from industrial lasers. Personnel may be exposed to hazardous noise levels at or above 85 dBA, and are required to wear ear plugs and/or muffs while observing or inspecting areas with hazardous noise. Sources of hazardous noise may also generate noticeable vibration. Such sources include heavy equipment and machinery, and large motors, compressors and pumps which may be located in semi-enclosed structures. Personnel may be exposed to smoke, dust and fumes from material stockpiles, moving and handling equipment, and process equipment. When such conditions are anticipated, personnel are advised to stay upwind of these sources. Outdoor inspections may occur during all types of weather conditions, including extreme heat, cold, or high wind. Thermal stress is the most serious potential hazard; therefore, personnel must ensure adequate hydration and wear appropriate attire and field gear when conducting outdoor site inspections. Inspection acitivies may be conducted on various terrains and in remote locations where pits, holes, and trenches may be encountered. Poisonous insects, plants, and snakes may be present. Personnel should be aware of their surroundings and take evasive actions to avoid contact with such hazards. For inspections where air monitoring is conducted, personnel are required to wear full-face respirators when in close proximity to air emission sources. Although personnel approach these sources from upwind, the wind direction could change at any time and potential inhalation hazards may be present. **REFER TO PPE HAZARD ASSESSMENT FORM FOR SPECIFIC EXPLANATION OF HAZARDS ASSOCIATED WITH THIS JOB HAZARD ANALYSIS.**

CERTIFICATION OF HAZARD ASSESSMENT

SUPERVISOR: Margaret Osborne	DATE: 12-10-14	SAFETY/HEALTH REPRESENTATIVE: [illegible]	DATE: 12-9-14

PPE Hazard Assessment Form

HEALTH AND SAFETY HAZARDS		
mical Hazards		**Description/Mitigation Methods**
	Vapors/gases	Personnel may be potentially exposed to various chemicals while inspecting process equipment, piping, storage areas, pollution control devices, tanks, and treatment systems. Chemicals may include, but are not limited to: organic chlorinated and non-chlorinated solvents; bulk flammable, combustible, toxic/corrosive, or inert/cryogenic gases; petroleum fuels; petroleum and non-petroleum oil substances; inorganic acid and alkaline liquids; metallic and non-metallic mineral solids; and, organic corrosives.
X	Dusts/mists/fumes	Personnel may be exposed to smoke, dust and fumes from material stockpiles, moving and handling equipment, and process equipment.
X	Liquid splash	Same as for vapor/gases
X	Other	Physical hazards may include loud noise, dust, smoke, and vibration from heavy equipment and machinery, noxious odors, forklift and other vehicular traffic, and occasionally, non-ionizing radiation from industrial lasers.
Comments: (potential hazards associated with air monitoring)		Personnel may scan emission sources using the FLIR camera to determine if leaks/plumes are present. If leaks are observed, personnel approach the unit from upwind to limit potential inhalation exposures. VOC sensors and/or toxic vapor analyzers (Photoionization Detectors) are to be carried into the field and used whenever the inspector has knowledge, based on their best professional judgment or when so advised by the SHEMP manager, that monitoring may be needed. This prior knowledge of potential contaminants should be obtained by a thorough review of the following prior to site entry: 1. Previous case history of the site from previous EPA inspections 2. Knowledge obtained from interviewing other inspectors who had gone to this site 3. SIC code lookups 4. Company history on either the EPA site or Industry internet search 5. Past EPCRA reporting 6. Companies that have a history of past releases 7. Chemical inventories obtained from the company 8. Industrial hygiene data obtained from the company. If exposures are expected at any time that would be ½ of the TLV or PEL (whatever is more conservative) or if monitoring equipment (carried into the field) indicates exposures at greater than or equal to this "action limit", then the inspector is required to don their full-face air purifying respirator, with chemical-specific cartridges, during the inspection or evacuate the area immediately.
sical Hazards		**Description/Mitigation Methods**
X	Ergonomics	Personnel may experience repetitive motion or prolonged awkward positions during observations. Additional tasks during monitoring may include infrequent lifting, pushing, pulling, or carrying of heavy objects. Vibration, heat or cold may add risk to these work conditions. The level of risk depends on the intensity, frequency, and duration of the exposure to these conditions. Breaks at regular intervals, careful lifting techniques, secure grip on equipment items, and packing at desk level or higher will reduce potential exposure risk.
X	Heat —high temperatures	Employees engage in field activities during all types of weather conditions, including extreme heat. Thermal stress is the most prevalent potential hazard. Personnel must ensure adequate hydration and wear appropriate field gear while engaging in inspection activities. Other potential sources of heat hazards include areas where welding, metal fabrication, or metal melting occurs, heated storage vessels, steam lines, and combustion exhausts ducts.
X	Cold —cold temperatures	Employees engage in field activities during all types of weather conditions, including extreme cold. Although inspections are typically performed in temperate climates, exposure to freezing cold may be a potential hazard. Therefore personnel must ensure adequate hydration and appropriate field gear (layers, protecting the extremities especially fingers, toes, nose, and ears) is worn while engaging in emergency response activities. Personnel should be trained on the signs and symptoms of frost bite and hypothermia and understand corrective measures to take.
X	Fire	Due to the nature of industrial facilities, potential fire or explosions hazards are possible. Personnel should follow site-specific fire safety and emergency response procedures for evacuation as the situation dictates. In addition, EPA staff should always accompanied by site personnel.
X	Electricity	Industrial sites have various electrical systems. Employees may be exposed to potential electrical hazards during inspection activities, depending upon the type of facility equipment and processes. Personnel should adhere to site-specific safety measures to avoid electrical hazards as the situation dictates. Maintain a safe distance from all electrical components. If exposed lines are present, do not touch any metal objects/equipment nor stand in nearby pools/puddles of water. In addition, EPA staff should always accompanied by site personnel.
X	Radiation — ionizing, non-ionizing	Personnel may occasionally inspect facilities where potentially hazardous industrial lasers are used for specific purposes, such as thickness gauging, distance measurement, cutting, or penetration. Such devices typically are shielded and have warning symbols posted. Damage to eyes or local skin burns are the potential hazards. Personnel should maintain adequate distance from industrial lasers in accordance with site specific safety procedures and direction by site personnel.
X	Noise and vibration	Personnel may be routinely exposed to hazardous noise levels above 85 dB during site inspections. Sources of hazardous noise may also generate noticeable vibration. Such sources include heavy equipment and machinery, and large motors, compressors and pumps which may be located in semi-enclosed structures. Employees are required to wear ear plugs and/or muffs when conducting inspection activities around hazardous noise sources. Employees should minimize time spent in areas with high vibration levels to avoid symptoms of motion sickness or dizziness.

PPE Hazard Assessment Form

HEALTH AND SAFETY HAZARDS		
X	Slips/Trips/Falls	Slips/trips/falls are always likely when walking walking through an industrial plant. In addition, many of the field acitivies are conducted outside where pits, holes, and various terrains are encountered. Personnel need to be cognizant of their surroundings, utilize steel-toed boots with sufficient tread, and take evasive actions to avoid contact with such hazards.
X	Elevation - Falls	Personnel may climb stairways or enter catwalks to access tanks, vessels and equipment higher than ground level to observe and inspect the condition of such sources. Personnel should exercise caution when climbing ladders or stairways, and ensure that these are equipped with approriate handrails and other safeguards. Personnel must inspect stairways/walkways to ensure structural integrity and/or question site personnel regarding structural stability prior to climbing. Personnel are not to climb ladders.
X	Other	Vehicle accidents and traffic are potential hazards encountered while driving to and from, and walking within, large industrial facilities. Personnel are required to take Defensive Driving Training every 3yrs, and should be cognizant of internal and external vehicle traffic (e.g. forklifts, golf carts, earth-movers, 18-wheek trucks etc) when moving throughout an industrial site during inspections.
Biological Hazards		**Description/Mitigation Methods**
X	Animals/Insects	Employees may encounter poisonous insects and snakes in outdoor locations during site inspections. Personnel need to be cognizant of their surroundings and take evasive actions to avoid contact with such hazards. Wearing long sleeves and other protective clothing is recommended when such outdoor conditions are anticipated to reduce potential exposures.
X	Other	Employees conducting inspections in outdoor locations may encounter poison ivy and other poisonous plants. Personnel must be trained to recognize common poisonous plants. In the field, employees should be aware of their surroundings, and evade areas which may have poisonous plants to prevent injury/illness. Cut-resistant gloves, long sleeves and other protective clothing are recommended when such outdoor conditions are anticipated to reduce potential exposures.

Completed by: Kendra Gomez & Diana Lundelius **Date:** May 19, 2011
Updated by: Kendra Mask **Date:** December 19, 2019
SHEMP Review KendraMask **Date:** 12/19/19

Required Personal Protective Equipment (PPE)			
Where engineering and administrative controls are not feasible or sufficient for controlling hazards, PPE must be used to protect workers. The following PPE is required for the noted tasks above:			
Eye and Face Protection			
X	Safety glasses with side shields		Reflective goggles/face shield
	Chemical splash goggles		Cutting/brazing/welding eye protection
	Face shield	**X**	Other: Sunglasses
Head Protection			
X	Hard hat, bump cap		Helmet, cowl, hood
	Welding helmet/mask		Other:
Foot Protection			
X	Steel-toed safety boots		Other:
	Chemical-resistant boots		
Body Protection			
	Apron (splash, work)		Head-reflective garments
	Lab coat		Sleeves (cut-resistant)
X	Coveralls (work, chemical-resistant) Hazard Type: Fire Type coverall: Nomex	**X**	Other: Appropriate field gear for the weather (thermal/cold stress), long sleeves and other protective clothing if poisonous insects/snakes/plants may be encountered
Respiratory Protection			
X	Respirator (situational dependant)	**X**	Type of respirator: Full-Face with GMC-H cartridges
Hand Protection			
	Rubber insulating gloves		Rubber insulating sleeves
	Rubber insulating hoods	**X**	Other: Leather Work Gloves
Other: Ear plugs and/or muffs Sunscreen (*personal issue item)* Insect repellent (*personal issue item)* Personnel are not authorized to wear contact lenses during inspections due to potential reaction with chemical vapors. Prescription safety glasses are available through the R6 Health & Safety Office.			

HEALTH & SAFETY TRAINING REQUIREMENTS

EPA employees (without HAZWOPER training) must have at a **minimum** the following:

Course Name	Training Location	Training Frequency
24hr EPA H&S Training for Field Activities (OTH 952)	FedTalent	Initial – One time
8hr EPA H&S Training for Field Activities Refresher (OTH 952) that includes the following modules: • EPA's Occupational Health and Safety Program • Planning and Preparation for Field Activities • Hazard Communication • Chemical Hazards & Reactions • Basic Toxicology • Occupational Noise • Heat and Cold Stress • Human Factors/ Ergonomics • Natural Hazards • Personal Protective Clothing and Equipment • Ladders & Climbing	FedTalent	Annual
Defensive Driving	GSA Website	Every 3yrs
First Aid/CPR	In-Class	Every 2yrs
Respirator Fit Test & Training	SHEMP Manager	Annually

EPA employees who **maintain HAZWOPER certification** are required to have the following:

Course Name	Training Location	Training Frequency
24/40 hr HAZWOPER Training	In-Class	Initial – One time
8hr HAZWOPER Refresher	In-Class	Annual
Defensive Driving	GSA Website	Every 3yrs
First Aid/CPR	In-Class	Every 2yrs
Respirator Fit Test & Training	SHEMP Manager	Annually

OCCUPATIONAL MEDICAL SURVEILLANCE PROGRAM

All employees under this JHA will be assigned to the Clean Air Act Inspector/Enforcement Officer Work Order (040).

GENERAL INDUSTRIAL AIR INSPECTIONS

I HAVE READ OR BEEN BRIEFED ON THE HAZARDS AND PROTECTIVE MEASURES IDENTIFIED FOR THE ABOVE-LISTED TASKS AND FULLY UNDERSTAND THE JOB-SPECIFIC REQUIREMENTS THAT HAVE BEEN ESTABLISHED.

DATE	EMPLOYEE NAME	EMPLOYEE SIGNATURE	EMPLOYER NAME
12/10/14	Greg Valentine		R6 U.S. EPA KCG 6/6/17
12/10/14	Charles W Hendrick		R6 EPA LEA Agency 12/15 KCG
12-10-14	DIANA LUNDELIUS		R6 EPA
12/10/2014	Cynthia J Kaleri		R6 EPA
12/10/2014	JOHN L JONES		R6 EPA GEN-AA KCG 6/6/17
12/10/2014	RAYMOND MAGYAR		R6 EPA-AA KCG 6/12/17
12/10/14	Donald M Smith		R6 EPA KCG 6/6/17
12/10/14	Samuel Yates		R6 EPA
12/10/14	David Eppler		R6 EPA KCG 1/6/15
2/11/14	Tony Robledo		R6 EPA
12/11/14	Dorothy Crawford		R6 EPA GEN KCG 1/20/16
12/11/14	Clint Rachal		EPA R6 KCG 6/6/17
12/16/14	Emad Shahin		EPA - R6
12/16/14			
12/16/14	Lawrence Craig Lute		EPA R6 KCG 6/6/17
12/16/14	James Leathers		EPA - R6
12-16-14	Dominique Duplechain		R6 EPA LEA Agency 12/15 KCG
12/16/14	DEBBIE FORD		EPA - R6
05/04/15	Mark Steed		EPA - R6 KCG 11/12/16
11/5/15	Sarah Frey		EPA - R6
11-5-15	Lisa Schaub		EPA R6 KCG 11/8/17
11-5-15	Justin Chen		EPA R6
11-5-15	Bridget Weir		EPA R6

GENERAL INDUSTRIAL AIR INSPECTIONS

I HAVE READ OR BEEN BRIEFED ON THE HAZARDS AND PROTECTIVE MEASURES IDENTIFIED FOR THE ABOVE-LISTED TASKS AND FULLY UNDERSTAND THE JOB-SPECIFIC REQUIREMENTS THAT HAVE BEEN ESTABLISHED.

DATE	EMPLOYEE NAME	EMPLOYEE SIGNATURE	EMPLOYER NAME
11/12/15	PRINCE NTODZO		EPA R6
11/16/15	Brandon Bammel		EPA R6
12/10/15	Kevin J. Kim		EPA R6
12/01/14/16	Kayla Buchanan		EPA R6
10/13/16	James Haynes		EPA R6
11/19/19	Aimee Ross		EPA R6
01/15/20	Ben Rosenthal		EPA R6
7/20/2021	Jamie Salabogi		EPA R6
08/26/2021	Colleen McCarthy		EPA R6
08/27/2021	Daniel Williams		EPA R6

GENERAL INDUSTRIAL AIR INSPECTIONS

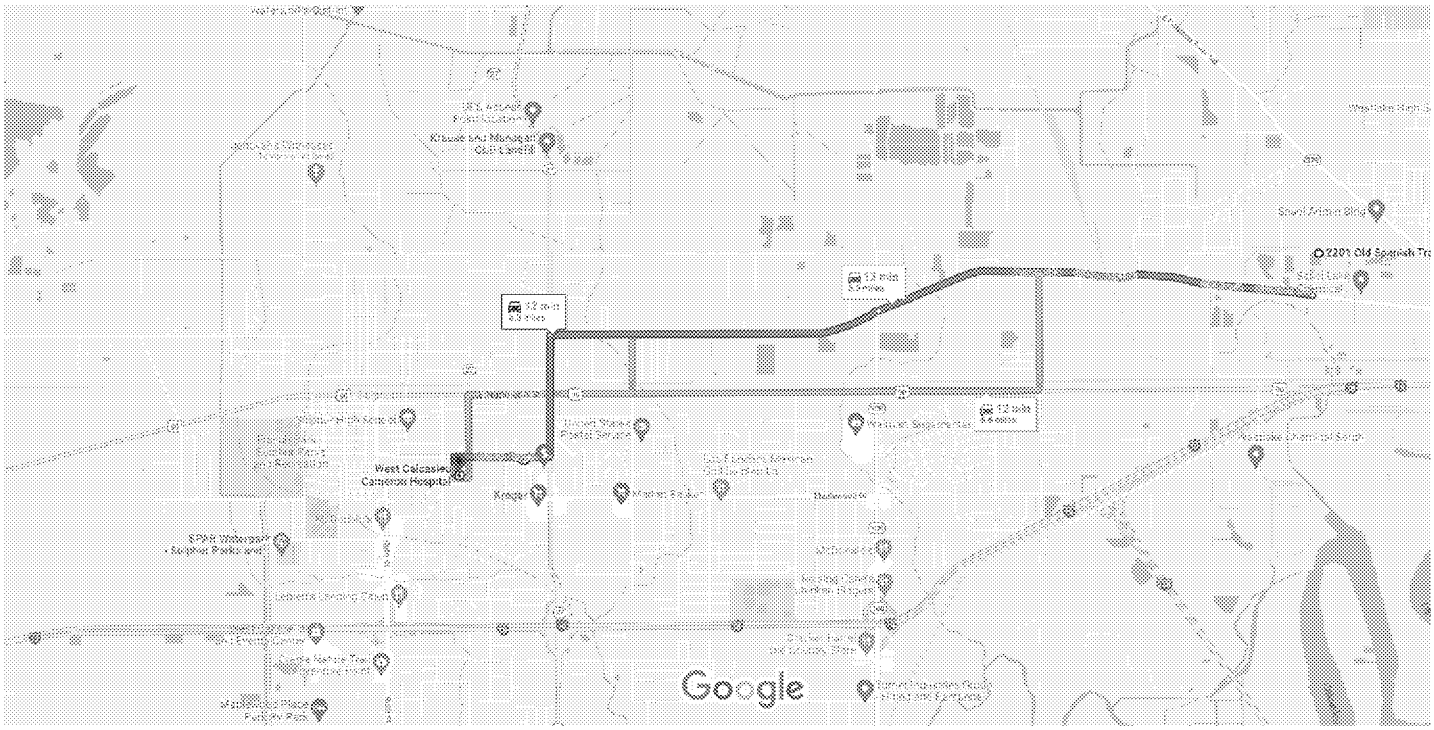
I HAVE READ AND UNDERSTAND THE HAZARDS AND PROTECTIVE MEASURES IDENTIFIED FOR THE ABOVE LISTED TASKS AND HAZARDS AND AGREE TO FOLLOW THE MEASURES THAT HAVE BEEN ESTABLISHED.

DATE	EMPLOYEE NAME	EMPLOYEE SIGNATURE	EMPLOYER NAME
11/12/15	PRINCE NFODZO		EPA R6
11/16/15	Brandon Bammel		EPA R6
12/10/15	Kevin J. Kim		EPA R6
1/01/14/16	Kayla Buchanan		EPA R6
10/13/16	James Haynes		EPA R6
6/6/17	Jim Gold		EPA R6

Google Maps

2201 Old Spanish Trail, Westlake, LA 70669 to West Calcasieu Cameron Hospital

Drive 6.3 miles, 12 min



Map data ©2022 2000 ft

2201 Old Spanish Trail
Westlake, LA 70669

Drive from E Burton St/Old Spanish Trail to Sulphur

11 min (6.2 mi)

1. Head west on E Burton St/Old Spanish Trail toward Trousdale Rd

2.7 mi

2. At the traffic circle, take the 2nd exit and stay on E Burton St/Old Spanish Trail

2.1 mi

3. Turn left onto N Beglis Pkwy

0.8 mi

4. Turn right onto Cypress St

0.1 mi

5. Continue onto Loretto Ave

226 ft

6. Turn right onto Cypress St

0.4 mi

Drive to your destination

1 min (0.1 mi)

7. Turn left

0.1 mi

8. Turn left

Destination will be on the right

141 ft

West Calcasieu Cameron Hospital
701 Cypress St, Sulphur, LA 70663

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.

EPA COVID-19 Job Hazard Analysis (JHA) Supplement, July 6, 2020, Final

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6. EPA COVID-19 OLEM Job Hazard Analysis Supplement Example

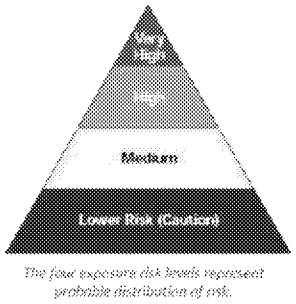
1. Introduction

- The COVID-19 Public Health Emergency is very dynamic. Federal, state and local government guidance is updated frequently. There may be new CDC, OSHA or EPA guidance that will impact the current content of this JHA prior to the next update. As a result, *it is important to review the government links in this JHA for new information*. Additionally, due to possible differences in state or local health department requirements on COVID-19, the employee, supervisor and the SHEMP manager should review applicable state/local requirements before traveling and deployment to a site. These state/local requirements may be more flexible for essential workers that are traveling into the area, and EPA travel for field work may qualify as such essential travel.
- Prior to travel, assess the prevalence for COVID-19 cases in the area(s) you are traveling to (and through) in addition to where you will be performing site work. This assessment should include evaluation of whether the area has demonstrated a downward trajectory of positive tests and documented cases within a 14-day period. Including this will help staff determine how to "assess the prevalence.".
- Specific COVID-19 information can be found on state/territorial/local government and health department websites. Available sources include the CDC COVID-19 Tracker, Johns Hopkins University Coronavirus Resource Center[1], the COVID Tracking Project[1] , the U.S. Census Bureau's Coronavirus (COVID-19) Pandemic Site and other expert sources. EPA also developed the EPA Facility Status Dashboard aid in facility reopening decisions. The Dashboard provides information on the status of each gating criterion in the commuting area surrounding our facility locations.
- Employees in consultation with their supervisor and SHEMP manager should use this JHA Supplement as a template to address COVID-19 health concerns. The Agency recommends this JHA Supplement be used for all field work until such time that the COVID-19 public health emergency is over.

2. OSHA Worker Exposure Risk to COVID-19, Summary

[1] Non-federal sites are included for informational purposes only and do not constitute any endorsement by EPA or its employees.

OSHA Guidance on Preparing Workplaces for COVID-19 provides four COVID-19 exposure risk categories. The use of the term "workers" below includes EPA field staff that are on location or in transit to facilities/sites or field locations.:



Occupational Risk Pyramid for COVID-19

- **Very High Exposure Risk**
  - Very high exposure risk jobs are those with high potential for exposure to known or suspected sources of COVID-19 during specific medical, postmortem, or laboratory procedures.
  - Workers in this category include:
    - Healthcare workers (e.g., doctors, nurses, dentists, paramedics, emergency medical technicians) performing aerosol-generating procedures on known or suspected COVID-19 patients.
    - Healthcare or laboratory personnel collecting or handling specimens from known or suspected COVID-19 patients (e.g., manipulating cultures from known or suspected COVID-19 patients).
    - Morgue workers performing autopsies, which generally involve aerosol-generating procedures, on the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death.
  - Personal Protective Equipment (PPE):
    - Most workers at very high exposure risk likely need to wear gloves, a protective suit, a face shield or goggles, and either a face mask or a respirator, depending on their job tasks and exposure risks.
    - Those who work closely with (either in contact with or within six feet of) people known to be, or suspected of being infected with COVID-19, should wear respirators.

- **High Exposure Risk**
  - High exposure risk jobs are those with high potential for exposure to known or suspected sources of COVID-19.
  - Workers in this category include:
    - Healthcare delivery and support staff (e.g., doctors, nurses, and other hospital staff who must enter patients' rooms) exposed to known or suspected COVID-19 patients.
    - Medical transport workers (e.g., ambulance vehicle operators) moving known or suspected COVID-19 patients in enclosed vehicles.
    - Mortuary workers involved in preparing (e.g., for burial or cremation) the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death.
  - Heightened Engineering Controls, Administrative Controls and Safe Work Practices Recommended (Discuss with SHEMP Manager)
  - PPE:

        - Most workers at high exposure risk need to wear gloves, a protective suit, a face shield or goggles, and either a disposable surgical mask or a respirator, depending on their job tasks and exposure risks.
        - Those who work closely with (either in contact with or within 6 feet of) people known to be, or suspected of being, infected with COVID-19 and **should wear assigned respirators**.

- **Medium Exposure Risk**

    - Medium exposure risk jobs include those that require frequent and/or close contact with (i.e., within six feet of) people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients. In areas without ongoing community transmission, workers in this risk group may have frequent contact with travelers who may return from locations with widespread COVID-19 transmission. In areas where there is ongoing community transmission, workers in this category may have contact with the general public (e.g., in schools, high-population-density work environments, and some high-volume retail settings).
    - Engineering Controls - Install physical barriers, such as clear plastic sneeze guards, where feasible.
        - Administrative Controls: Consider offering disposable surgical masks to ill employees to contain respiratory secretions until they are able leave the workplace (i.e., for medical evaluation/care or to return home).
        - Where appropriate, limit public's access to the worksite, or restrict access to only certain workplace areas.
        - Consider strategies to minimize face-to-face contact (e.g., drive-through windows, phone-based communication, telework).
    - PPE:
        - Workers with medium exposure risk may need to wear some combination of gloves, protective suit, a disposable surgical mask, and/or a face shield or goggles.
        - PPE ensembles for workers in the medium exposure risk category will vary by work task, the results of the employer's hazard assessment, and the types of exposures workers have on the job.
        - In the event of a shortage of masks, a reusable face shield that can be decontaminated may be an acceptable method of protecting against droplet transmission. Ensure that when using a face shield it covers the entire face (extends to the chin or below and reaches the sides of the face).
    - **Note that a respirator is not recommended for jobs classified at medium risk**, unless it is part of the PPE normally recommended as part of the hazard assessment.

- **Lower Exposure Risk (Caution)**

    - Lower exposure risk (caution) jobs are those that do not require contact with people known to be, or suspected of being, infected with SARS-CoV-2 nor frequent close contact with (i.e., within six feet of) the general public. Workers in this category have minimal occupational contact with the public and other coworkers.
    - Engineering Controls & Administrative Controls

- Additional engineering controls are not recommended for workers in the lower exposure risk group. Employers should ensure that engineering controls, if any, used to protect workers from other job hazards continue to function as intended.
- Monitor public health communications about COVID-19 recommendations and ensure that workers have access to that information. Frequently check the CDC COVID-19 website: www.cdc.gov/coronavirus/2019-ncov.
- Collaborate with workers to designate effective means of communicating important COVID-19 information

o PPE

- Additional PPE is not recommended for workers in the lower exposure risk group.
- Workers should continue to use the PPE, if any, that they would ordinarily use for other job tasks.
- **Note that a respirator is not recommended for jobs classified at low risk,** unless it is part of the PPE normally recommended as part of the hazard assessment.

3. Pre-Travel Considerations

For pending site work, identify individuals who indicate:

a) Feeling well and show no signs of illness.
b) Not exhibiting any COVID-19 symptoms listed by the CDC, including, but not limited to fever, cough, shortness of breath, or difficulty breathing.
c) No contact with known or presumptive COVID-19 positive individual(s) in past 48 hours. Employees who have been in direct contact with a COVID-19 affected person must notify their supervisors.
d) Completed self-quarantine if recent known or suspected exposure to COVID-19 (Follow CDC guidance on discontinuation of isolation).
e) Willing to be onsite for project duration, wear face covering (e.g., cloth face covering, disposable surgical mask) or respirator (when required) and social distance, etc.
f) The employee, supervisor and the SHEMP manager should consider when EPA employees are traveling from a population center with COVID-19 cases to a population/community with fewer cases as part of the hazard assessment. Not only is there a risk of EPA staff becoming exposed to COVID-19 during fieldwork, but EPA employees could transmit COVID-19 to communities that they visit. Since many of the EPA offices are in the largest cities in their Region with COVID-19 cases, EPA staff traveling to other communities could pose a risk to those communities that may outweigh the benefit of the fieldwork. Some state/local governments may impose restrictions on outsiders traveling into their jurisdiction, and EPA staff should comply with those restrictions. The state/local restrictions may be more flexible or not apply to essential work such as EPA field work.

4. EPA COVID-19 JHA Supplement Instructions:

a) Complete all information as requested on the form below, such as supervisor/SHEMP name and signature; date of JHA, JHA number, name of activity, department, location and other information (name of participating employees other than the supervisor).
b) Review the existing JHA for the task, the OSHA COVID-19 risk levels above, and the listed PPE. Check off any that apply to this job's tasks.
c) For task steps considered OSHA Medium, High and Very High risk, list out the basic task steps, the actual COVID-19 hazard, and the projected hazard control (PPE, engineering control, administrative control).
d) Note that some but not all possible hazards are listed at the bottom of the first page, along with some possible controls.
e) Note that under the box containing the checklist of PPE is a section that documents that engineering controls and administrative controls were considered and review this section after completing the rest of the JHA.
f) Make sure to list all feasible engineering and administrative controls being considered. If they are not feasible, list the reason(s).
g) Complete the column for Basic Tasks or Steps for the job being performed. It is not necessary to list minor insignificant steps or non-COVID-19 related hazards (Non-Covid-19 hazards are included in the original JHA).
h) Complete the column for Corrective Action or Hazard Controls for each Task or Step listed. Make sure to list specific control methods such as engineering controls, administrative controls and specific PPE.
i) Consider other additional risk such as working indoors, tight spaces, performing strenuous activity or working in high heat and/or humidity environments.

Points to remember: This is to be used as a supplement to existing JHAs to document important controls for COVID-19 related hazards that may be present during specific work tasks. A supervisor and employee that performs the job should complete this form together; to ensure they agree as to the actual steps involved in this job, in conjunction with the local SHEMP Manager.

5. EPA COVID-19 Job Hazard Analysis (JHA) Supplement - Template

	Job Hazard Analysis (JHA) **COVID-19 Supplement**	**Supervisor Name:**	James Leathers
		Supervisor Signature:	
		SHEMP Manager Name:	Kendra Mask
		SHEMP Manager Signature:	
		Date: 1.18.22	
Job/Activity Name: COVID-19 Supplement – Attach the job specific JHA used for the job task to this supplemental JHA to document the OSHA risk level provided below for the job.		**JHA #:** COVID Supplement to existing JHA (please attach) General Industrial Air Inspections	
Division/Branch: CAED/Air Enforcement	**Area /Location(s)**: 2201 Old Spanish Trail, Westlake, LA 70669 Medium Risk	**Other Information** (JHA participating employees): Justin Chen	

REQUIRED PERSONAL PROTECTIVE EQUIPMENT FOR ENTIRE JOB ☒ Appropriate Basic PPE (Safety glasses, safety shoes, hard hat, gloves) See Attached JHA			
☐ Safety glasses	☐ Respirator, Type _____	☐ Welding gloves/ leathers	☐ Safety shoes
☐ Goggles	☐ Hard hat	☐ Protective suit	☐ Other rubber boots_____
☐ Face shield	☐ Hearing protection	☐ Lab Coat &/or Apron	☐ Portable GFCI
☐ Disposable surgical mask	☐ Appropriate gloves	☐ Fall protection	☐ High visibility vest
☐ Other_____	☐ Other_____	☐ Other_____	☐ Other_____

Follow the steps outlined in the EPA Self-Assessment to Stop the Spread of COVID-19 tool to make sure employees are not ill or symptomatic. Perform this self-assessment prior to departing and daily before reporting to work.

Always consider Engineering or Administrative Controls before use of PPE. These controls were considered: ☒YES, ☐NO, if not feasible explain why:

Basic Tasks or Steps	Hazards	Corrective Action or Hazard Controls
1. Vehicle Travel	Contact with person infected with COVID-19, potential spread to others (**Note:** Same hazard for all activities)	a) For EPA or rental vehicle, follow EPA Disinfection Guidance (EPA OMS-SSD Vehicle Utilization, Cleaning, and Disinfecting Recommendations 4/27/20). b) Obtain adequate EPA-registered disinfectants and hand sanitizers for duration of project (vehicle disinfection kits) from Regional or Program equipment/supply managers. c) Clean and disinfect "common touch" vehicle surfaces, e.g., door handles, console, touch screen, steering wheel, inside of door, before and after use. Disinfect/sanitize before and after use by new driver. d) For EPA-owned or rental vehicle, document name and date of initial disinfection/sanitization. e) Travel should be limited to one person per vehicle. If the project requires multiple personnel in one vehicle, don cloth face covering or disposable surgical mask, maximize outside air flow and attempt to separate occupants by at least six feet. f) Minimize fuel fill-ups: wear nitrile gloves and use cloth face cover or disposable surgical masks, when within six-feet of another person; if not wearing gloves, use disinfectant wipe on gas station touch screen before and after use.
2. Accommodations		a) Attempt to secure hotel room with an in-room kitchen or microwave oven and refrigerator. b) If an in-room kitchen or in-room microwave/refrigerator is available, purchase groceries once a week and cook meals in the hotel room. c) If in-room facilities are not available, consider meal delivery service, takeout, or curbside pickup. d) Eating inside of restaurants should be avoided. e) Avoid hotel breakfast buffets, bulk serving containers, and shared service items. f) Disinfect own room with an EPA List N approved disinfectant. g) Use "No Housekeeping" sign to limit access to hotel room.
3. Site Work		a) Follow the steps outlined in the EPA Self-Assessment to Stop the Spread of COVID-19 tool or similar questionnaire to make sure employees are not ill or symptomatic. Workers should be directed to contact the Site Supervisor or Safety Officer if they answer yes to any of these questions. Perform this or similar self-assessment daily before reporting to work.

Basic Tasks or Steps	Hazards	Corrective Action or Hazard Controls
Site Work, continued	Contact with person infected with COVID-19, potential spread to others (**Note:** Same hazard for all activities)	b) EPA Site Supervisor or designee has the responsibility for ensuring that personnel with COVID-19 symptoms do not come onsite. c) The Site Safety Officer should make daily observations of COVID-19 safety compliance and consider monitoring response workers for symptoms. d) Use electronic sign-in (spreadsheet, SharePoint site, etc. Avoid use of clipboard and pen). e) Conduct daily health status screening of site personnel (Follow OSHA recordkeeping requirements). f) If screening is performed, include a non-contact temperature check, e.g. forehead thermometer, and seek guidance from a public health department or healthcare professional on how to implement a health status screening and temperature screening program. g) Require face coverings for all indoor and outdoor operations when social distancing cannot be consistently maintained. h) Require face coverings for all outdoor operations where social distancing cannot be consistently maintained. Similar to administrative and engineering controls implement during Level A, B and C PPE use, if the face covering causes a hazard to a worker (e.g. heat and physical stress while performing strenuous work), implement administrative or engineering controls to limit the hazard caused by the face covering. If field activities prevent social distancing (e.g. assisting in donning and doffing of PPE, composite water sampling), use of a cloth face covering is recommended. i) Even when social distancing is maintained, EPA recommends following the respective state or local jurisdiction. j) Site personnel should always routinely carry a small container of hand sanitizer with at least 60% alcohol, a face covering that covers the nose and mouth, and nitrile gloves. k) In indoor residential environments, site personnel cannot control actions of resident(s). Face coverings are required for all work in residential properties. Site personnel should avoid surface contact whenever possible and should wear nitrile gloves. With the permission of residents, site personnel should wipe down all surfaces that were touched by them before departing residence. l) For site work that involves multiple locations, disinfect or replace equipment, PPE, and personal items before moving to next location. m) Do not shake hands. Use other forms of non-contact greeting. n) Avoid touching face.

Basic Tasks or Steps	Hazards	Corrective Action or Hazard Controls
Site Work, continued	Contact with person infected with COVID-19, potential spread to others (**Note:** Same hazard for all activities)	o) Site personnel should be attentive to handwashing upon arrival at the site, after exiting exclusion zone, prior to taking a break, prior to eating lunch, after use of the bathroom, using shared items and upon leaving the site for the day, etc. Encourage adherence to prescribed handwashing guidelines. p) Augment site handwashing equipment. Make sure soap and water handwashing facilities are readily available onsite. Do not rely on hand sanitizer alone. q) Avoid sharing items with others. This includes personal items such as pen and paper. r) When equipment must be shared (e.g., monitoring and sampling equipment), disinfect touch surfaces (following manufacturer's instructions) before providing to other individual for use and wear nitrile gloves. s) Whenever PPE such as protective suits, boots, air-purifying respirators are needed, attempt to don PPE without an attendant. If an attendant is needed, the attendant should wear a face covering and nitrile gloves. t) When trailers are necessary, separate smaller trailers are preferable to single large trailers in order to facilitate separate space and social distancing of personnel. u) When weather permits, store equipment outside to limit confinement of personnel and number of entries and exits from trailers. v) When possible, use Skype, MS Teams or other virtual communications tools to limit personnel meetings. w) Site trailers, command post, port-a-johns, handwash stations, etc. must be cleaned and disinfected with an EPA List N approved disinfectant daily or more frequently with high use, with special attention to common touch points. x) For rental of select items (e.g. port-a-johns), periodic disinfection may be included. When this is not the case, select site personnel will be designated with this responsibility. y) Do not share respirators or cartridges.

Basic Tasks or Steps	Hazards	Corrective Action or Hazard Controls
	Contact with person infected with COVID-19, potential spread to others (**Note:** Same hazard for all activities)	
If recommended actions indicated in this JHA are not being followed on-site, please point out importance of following JHA to non-compliant workers. Report any incidents of non-compliance to the Site Safety Officer and/or Site Supervisor.		

Comments: This JHA is a supplement to the standard JHA that has been previously completed for typical work activities and is to be used to establish the level of COVID-19 risk. This should be used with a site Health and Safety Plan, Field Work Control Plan, Vessel Float Plan, Dive Safety Plan, etc. The level of risk determined by using this form helps to identify if additional protective equipment or work practice controls are needed due to COVID-19 risk.

The inspection is planned as an unannounced inspection. To meet this objective, agreement between EPA R6 Enforcement and EPA's National Enforcement Investigation Center (NEIC) to make a phone call from the parking lot, covering the COVID-19 Screening Questionnaire below, and informing EPA's decision to make entry and conduct an onsite CAA inspection. If responses by the facility cause concern for EPA inspectors, EPA may hand deliver a Document Request or CAA Section 114 Information Request with the Front Gate or Front Office rather than make entry.

Field Facility Screening Questionnaire for Civil Inspections – COVID-19 (as of 5/28/21) (not required before entry for criminal investigations)	
Questions for the facility:	**Facility Response:**
How many employees work at your facility?	
Are staffing and/or operational work hours curtailed or conducted in non-routine shifts due to COVID-19?	
What is the general layout of your facility? Are there areas with limited capacity or limited access due to COVID-19?	
Do employees practice safe social distancing?	
What type/size of facilities do you have to hold meetings with employees? Do you use an enclosed conference room? Do you limit capacity? Are you able to facilitate remote meetings with employees or with EPA for portions of this inspection?	
What policies do you have in place at your facility for COVID-19? Do you require employees to wear masks? If so, what type of mask is required?	
Does the facility allow visitors? **Note:** Federal Agencies and delivery of chemicals/supplies are excluded. Is there a visitor policy related to COVID-19? Note: Requirements for EPA inspectors that are more stringent than those required by other visitors will be considered a denial of access.	
What PPE do you provide employees and require visitors (if allowed) to wear?	
Do you have a dedicated nurse/doctor at the facility?	

Are you regularly testing your employees for COVID-19? Has anyone tested positive? If so, when and how many? What measures did you take after the employee tested positive?	
What cleaning is performed and what supplies do you use?	
Do you have any vaccination requirements for facility employees or visitors? If so, EPA can provide vaccination cards for our inspectors with the DOB blacked out or a letter from our SHEMP with status. Are there any concerns with this documentation? Note: we can ask about general vaccine status for facility employees, but not about specific individuals.	
Do you have any testing requirements? If so, what information is collected for tests, including information on individual inspectors?	
Have you had any COVID-19 cases? Are any currently active at the facility (within the last 2 weeks)? If so, how many?	

Message

From: Chen, Justin [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=695AEF04576247D8B25E78652793595F-CHEN, JUSTI]
Sent: 4/8/2022 4:45:29 PM
To: Leathers, James [Leathers.James@epa.gov]; brian.fontenot@la.gov
CC: Andrew Mills [Andrew.Mills@LA.GOV]; Au, Doreen [Au.Doreen@epa.gov]
Subject: RE: Sasol inspection next week

Hello all,

For the Sasol Inspection, Doreen and I will be traveling to Westlake on 4/11 and intend to make entry to the facility on 4/12 at approximately 8 AM.
4/12 – Speak to Sasol staff regarding questions on material balances for ethylene oxide production and emission reports
4/13 – Speak to Louisiana Integrated Polyethylene JV on waste water treatment, potentially tour the WWTP
4/14 – If tour wasn't conducted the prior day, do WWTP tour, then ask any questions and discussion on WWTP

My cell phone is Ex. 6 Personal Privacy (PP) so please feel free to reach out to coordinate further.

Best regards,

Justin Chen
Environmental Engineer, Air Toxics Enforcement Enforcement and Compliance Assurance Division EPA Region 6
1201 Elm St., Suite 500, ECDAT
Dallas, TX 75270
Office: 214-665-2273

From: Leathers, James <Leathers.James@epa.gov>
Sent: Wednesday, April 6, 2022 10:09 AM
To: brian.fontenot@la.gov
Cc: Andrew Mills <Andrew.Mills@LA.GOV>; Chen, Justin <Chen.Justin@epa.gov>
Subject: RE: Sasol inspection next week

Hi Brian,

The EPA on the inspection will be Justin Chen.

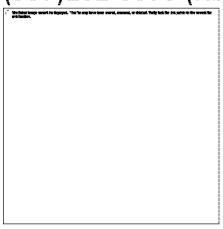
Justin please coordinate with Andrew directly, and cc Brian. Thanks

James Leathers
Environmental Engineer
EPA Region 6
Chief, Air Toxics Enforcement Section
Dallas, TX 75270
(214) 665-6569
leathers.james@epa.gov

From: Brian Fontenot <Brian.Fontenot@LA.GOV>
Sent: Wednesday, April 06, 2022 10:00 AM
To: Leathers, James <Leathers.James@epa.gov>
Cc: Andrew Mills <Andrew.Mills@LA.GOV>
Subject: Sasol inspection next week

James,
Could you please provide the contact info. for the EPA lead of the Subject inspection for coordination purposes? I've cc'ed Mr. Andrew Mills who will be accompanying if there's room. Thank you for your swift attention to this matter.

Brian Fontenot, Environmental Scientist Senior - Air
La. Dept. of Environmental Quality
Office of Environmental Compliance
Surveillance Division
111 New Center Dr.
Lafayette, LA 70508
(337) 262-5577
(337) 258-3071 (cell)
(337)262-5593 (fax)



Message

From: Brian Fontenot [Brian.Fontenot@LA.GOV]
Sent: 8/3/2022 1:46:27 PM
To: Chrissie Gubancsik [chrissie.gubancsik@la.gov]
CC: brian.tusa [brian.tusa@la.gov]; Haynes, James [haynes.james@epa.gov]
Subject: FW: VISR Deployment Scheduled
Attachments: VISR Itinerary_draft.docx

Hey Chrissie!
As discussed, the subject project will be in your area tomorrow (see itinerary). Mr. James Haynes with EPA R6 is our contact for coordination. His phone number is Ex. 6 Personal Privacy (PP) Please let me know if you have any questions. Thanks!

Brian

From: Haynes, James <haynes.james@epa.gov>
Sent: Wednesday, July 27, 2022 5:22 PM
To: Brian Fontenot <Brian.Fontenot@LA.GOV>
Cc: McCarthy, Colleen <McCarthy.Colleen01@epa.gov>; Leathers, James <Leathers.James@epa.gov>
Subject: RE: VISR Deployment Scheduled

Good evening Brian.

I apologize for the late notice – lots of things going on all at once… But we are scheduled to be in Louisiana next week for the VISR deployment. I have attached a draft itinerary.

Please let me know if you or anyone with DEQ would like to attend, and we can coordinate from there. As an FYI: these inspections will all be unannounced.

Again, apologies for the late notice. Hope to hear back.

Thanks,
James

From: Brian Fontenot <Brian.Fontenot@LA.GOV>
Sent: Monday, October 11, 2021 2:59 PM
To: Haynes, James <haynes.james@epa.gov>; Leathers, James <Leathers.James@epa.gov>
Cc: Rosenthal, Benjamin <Rosenthal.Benjamin@epa.gov>
Subject: RE: VISR Deployment Postponed

James,
Is there any update on the VISR deployment?

Also and this may be a question for James L., what is the latest on an EPA inspection at Blackwater Harvey?

Thanks!
Brian

From: Haynes, James <haynes.james@epa.gov>
Sent: Wednesday, August 18, 2021 12:09 PM
To: Brian Fontenot <Brian.Fontenot@LA.GOV>
Cc: Leathers, James <Leathers.James@epa.gov>; Rosenthal, Benjamin <Rosenthal.Benjamin@epa.gov>; Stucky, Marie <Stucky.Marie@epa.gov>
Subject: VISR Deployment Postponed

Hi Brian,

Our management is uncertain about the delta/lambda variants present in Louisiana, and EPA is expected to issue new travel guidance soon. As of right now, we will need to postpone the project. We are working to get some available dates between our team and the contractors, but it is difficult situation because we are not able to forecast out what the situation will be in several weeks or months.

We appreciate your efforts and everyone at the regional office who has helped in the targeting. I will follow-up as soon as more information becomes available.

Thanks,
James

James S. Haynes
Physical Scientist
U.S. Environmental Protection Agency, Region 6
Air Toxics Enforcement Section
1201 Elm Street, Suite 500 (MC: ECDAT)
Dallas, Texas 75270
214-665-8546

US EPA Region 6 – Site-Specific Health and Safety Plan (HASP)

GENERAL INFORMATION

Facility/Site Name:	**R6 GMAP Pollution Accountability Team (PAT) Louisiana**	
Field Start Date *(MM/DD/YYYY):*	04/11/2022	***Field End Date:*** 04/23/2022
Facility/Site Location: (complete address, if relevant)	Various facilities in St John the Baptist, St James, and Calcasieu Parishes, Louisiana	
General Description of Site Activities:	Surveillance of various facilities by GMAP. Inspectors to make entry based on GMAP	

EMERGENCY INFORMATION

Non-911 Emergency Phone: (Direct to police, fire, hospital and Facility; include area code)	**Police:** 985-652-9513	**Fire:** 985-359-0440
	Hospital: 225-869-5512	**Facility/Site:** NA
Medical Facilities: (Name and Address)	Saint John the Baptist and Saint James Parish: St. James Parish Hospital,1645 Lutcher Ave, Lutchere, LA 70071 225-869-5512. Calcasieu, Christus Ochsner Lake Area	
Directions to Local Medical Facilities:	(see attached map with directions)	
Site-Specific Emergency Response Procedures:	Will follow each facility emergency procedures	

EPA RESOURCES

	Name	**Work Phone**	**Mobile Phone**
Team/Project Leader:	James Haynes	214-665-8564	Ex. 6 Personal Privacy (PP)
First-Line Supervisor:	James Leathers	214-665-6569	
R6 SHEMP Manager:	Kendra Mask	(214) 665-7225	
Workmen's Comp Manager:	Kendrick Young	(214) 665-7466	---

HAZARDS / SAFETY

Applicable JHA(s):

Check Potential Hazards:

☐ Radiation	☑ Toxics	☑ Fire/Explosion	☑ Corrosives
☐ O_2 Deficiency	☑ Noise	☑ Physical	☐ Other:
☐ Dusts	☐ Heat/Cold Stress	☐ Biological	

Site Specific Hazard Description: (i.e. potential hazards, routes of entry, quantity of chemicals present, etc.)	Walk through and inspect site operations,always escorted by facility personnel and will wear appropriate PPE. Will observe safe work practices and will only go on elevated surfaces with functioning handrails. Inspecting facility processes including the use of TVA and IR cameras for LDAR monitoring. See attached list of potential chemicals present.
Safety Monitoring Equipment Required: (list equipment)	NA
Prevention:	*All site safety procedures shall be followed. Areas with potential exposure to chemical, physical and explosive hazards shall be avoided if at all possible. Team members shall not enter confined spaces or areas with potential unexploded ordinance. In case of emergency, all inspection staff shall exit and allow site personnel to contain and manage incident.*
Safety Supplies:	Reference attached JHA

Facility/Site Name:	R6 GMAP Pollution Accountability Team (PAT) Louisiana		
Field Start Date:	04/11/2022	***Field End Date:*** 04/23/2022	

HASP Approval / H&S Certification

This site HASP has been reviewed and constitutes the minimum anticipated safety requirements for personnel engaged in field activities at this project site. NOTE: THE HASP HAS TO BE COMPLETE WITH ATTACHMENTS BEFORE SIGNING.

By signing below, I certify that I have read and understand the JHA applicable to this HASP, have completed all required health and safety training, and possess all required personal protective equipment.

Team and/or Project Leader/ Cell Phone Number	*Signature/ Date:*
James Haynes / Ex. 6 Personal Privacy (PP)	

Team Member(s) Cell Phone Number	*Signature/ Date:*	***Team Member(s) Cell Phone Number***	*Signature/ Date:*
Benjamin Rosenthal /		/ Ex. 6 Personal Privacy (PP)	
Sarah Frey /		/	
/		/	
/		/	
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/		/	
/		/	
/		/	

By signing below, I certify that I have read and approved this HASP, and have confirmed the team listed above are all current in their H&S training/programmatic requirements as defined in their current JHA(s).

First-Line Supervisor: James Leathers	*Signature/ Date:*
Health & Safety Officer: Kendra Mask	*Signature/ Date:*

NOTE: ***After approval of the HASP and before departing to the field, the project leader must email a signed PDF copy to each of his/her TEAM MEMBER(s), FIRST-LINE SUPERVISOR, and the SHEMP MANAGER. The project leader must carry and maintain a signed hardcopy in the field and have it accessible for all team members.***

☐ ***HASP DISAPPROVED*** ***For Health & Safety Officer Use Only***

HASP Disapproved

Deficient Area(s): ☐ *HASP Error* ☐ *Training Error* ☐ *Programmatic Error*		
Health & Safety Officer: Kendra Mask	*Signature:*	*Date:*

JOB HAZARD ANALYSIS

Hazard (HT)

1. Toxic Chemic	15. Fall (Slips/Trips)
2. Flammable Chemicals	16. Fall (To a Different Level)
3. Corrosive Chemicals	17. Excavation (Collapse)
4. Environmental	18. Fire, Heat, Thermal, Cold
5. Explosion (Chemical Reaction)	19. Noise
6. Explosion (Over pressurization)	20. Radiation (Ionizing/Non-Ionizing)
7. Mechanical/Vibration	21. Visibility
8. Electrical (Shock, Short Circuit)	22. Weather
9. Electrical (Fire)	23. Caught (In, On, Between)
10.Electrical (Static, ESD)	24. Struck (By, Against)
11.Electrical (Loss of Power)	25. Driving
12.Ergonomic (Overexertion)	26. Confined Space
13. Ergonomic (Human Error)	27. Other
14. Vibration	

Job Task: General Industrial Air Inspections

Job Frequency/ Duration:
20/year; 1-5 days/site; may conduct several site inspections during one trip

Tools Used:
Digital Camera
FLIR Camera
Portable VOC Detector
Cell Phone
Portable Toxic Vapor Analyzer (borrowed from 6SF)

Chemicals Used:
Span gases for calibration – 10 lb or smaller compressed gas cylinders

CRITICAL TO SAFETY (CTS)

Risk Estimation Matrix

Probability of Occurrence of Harm	SEVERITY OF HARM			
	Catastrophic	Serious	Moderate	Minor
VERY LIKELY	Extreme	High	High	Medium
LIKELY	High	High	Medium	Low
UNLIKELY	Medium	Medium	Low	Negligible
REMOTE	Low	Low	Negligible	Negligible

* High = CTS tasks should receive engineering controls prior to assigning administrative or PPE controls.

FLIR = Forward Looking Infrared
VOC = Volatile organic compound
PPE = Personal protective equipment
MSDS = Material Safety Data Sheet

Job Description: Personnel conduct site inspections at various industrial facilities to determine compliance with federal emission standards, Title V Operating Permits, or Synthetic Minor Operating Permits. Personnel may scan various units using the FLIR camera to determine if leaks/plumes are present. If leaks are observed, personnel approach the unit from upwind to limit potential inhalation exposures. VOC detectors and toxic vapor analyzers may be utilized to confirm presence of certain types of emissions at the source. VOC detectors and vapor analyzers require periodic calibration using standard gases which come in small compressed gas cylinders. Inspections encompass indoor and outdoor site conditions, and include visual observations of operating and non-operating industrial machinery and equipment.

Step #	Procedures (LOP Procedure Step)	Potential Hazards	HT	Check CTS	Required Safe Practice	PPE
1	Pre-inspection: Collect and review available site information and records, coordinate travel, and develop site safety plan.	None	NA	NA	Consider anticipated weather conditions and potential hazards, and determine appropriate attire	NA
2	Deployment: Organize personnel/equipment/supplies; Conduct pre-inspection meeting at Regional Office (RO); Deploy to location either by car or airplane (personnel drive the majority of times).	Ergonomics, Driving, Weather	13, 15, 21, 22, 24, 25, 27	Medium	Careful lifting techniques; situational awareness of wet or uneven ground; secure grip; packing at desk level or higher; drive defensivly; do not text while driving; do not use phone while driving (passenger makes calls or move off road and stop)	Other Body Protection
3	Calibrate Instruments: Prior to site entry, personnel calibrate portable or hand-held VOC detector or toxic vapor analyzer, if such are to be used (conducted off-site to avoid cross contamination). If no portable detectors or analyzers will be used, proceed to step 4.	Pressurized gas cylinders	2, 27	Low	Follow instrument manual instructions and calibration gas MSDSs for proper handling of span gases during detector calibration	NA
4	Site Entry and Observation: Personnel may be requested to complete a short (<30 minutes) on-site facility-specific safety briefing before conducting an opening meeting. In the opening meeting, site-specific documentation, facility layout drawings, diagrams, reports, records and other data are requested for cursory review. Personnel then observe and inspect facility operations following the process flow throughout the site, both inside and outside. Special attention is given to process equipment, tanks, pollution control equipment, piping, drains, storage areas, and treatment systems. Personnel may scan	Poisonous insects or plants, chemicals, thermal/cold stress, noise, vibration, slips/trips/falls, severe weather, operational and/or moving heavy equipment and vehicles, pressurized/cryogenic	1-4, 6, 7, 14, 15, 18, 19, 20, 21, 22, 27	Low	Reference PPE Recommendations table and PPE Hazard Assessment Form	

	v[illegible] piping, or tanks with the FLIR camera from a distance e closer from an upwind direction. If unauthorized e[illegible]ons are noted, personnel document the deficiencies using the FLIR camera, a digital camera, and the VOC detector or toxic gas analyzer. At the conclusion of the site inspection, personnel conduct a closing meeting to communicate deficiencies, identify additional information needs, or request follow up actions.	bulk gas storage ves[illegible] hazardous material storage vessels, hig[illegible] pressure liquid or gas piping systems, non-ionizing radiation from industrial lasers, dust and smoke, noxious odors				
5	Deployment to Next Location: If applicable, personnel drive to next industrial facility and repeat steps 3 & 4 above. If not, personnel proceed to step 6.	Reference Steps 3 & 4				
6	Post-Inspection Return: Upon completion of inspection visit(s), return to RO and proceed with post inspection activities (administrative in nature).	Ergonomics, Driving, Weather	13, 15, 21, 22, 24, 25, 27	Medium	Careful lifting techniques; situational awareness of wet or uneven ground; secure grip; packing at desk level or higher; drive defensively; do not text while driving; do not use phone while driving (passenger makes calls or move off road and stop)	Other Body Protection

HAZAR[illegible] ALL POTENTIAL HAZARDS ASSOCIATED WITH THE JOB (CHECK ALL THAT AP[illegible]

Physi[illegible]						
General	☒	heat	☒	cold	☒	noise
	☒	explosion	☒	fire	☒	weather
	☐	fatigue	☐	violence	☒	illness/injury
Radiation	☐	ionizing	☐	microwave	☐	light
Vehicles	☒	traffic	☒	heavy equip	☒	forklift
	☐	helicopter	☐	small aircraft	☐	boat
Boat Ops	☐	sediment sampling	☐	rapid water	☐	open water
	☐	diving	☐	electrofish		
Industrial	☒	comp gas	☒	electricity	☐	confined space
	☒	equip	☒	moving parts		
Overhead	☐	obstruction	☒	falling objects		
Elevation	☒	roof	☒	scaffold	☒	ladder
	☒	stairs	☒	catwalk		
Slips/trips	☒	terrain	☒	debris	☒	slippery
	☐	trench	☒	pits/holes		
Other physical hazards:			☒	Noxious odors, pressurized vessels, vibration, non-ionizing radiation (lasers)		

[illegible]logical						
[illegible]griculture	☐	CAFO	☐	fish	☐	farm anim[illegible]
Animals	☒	dogs	☒	feral animals	☒	snakes
Insects	☒	spiders	☒	mosquitoes	☒	wasp/hornet
	☒	bees				
Pathogens	☐	bloodborne	☐	sewage	☐	med/lab
Other Biological:	☒	scorpions, poisonous plants				

Chemical						
Containers	☒	ammonia	☒	chlorine	☒	other
VOCs	☒	solvents	☒	fuel	☒	oils
Wastes and other materials	☐	sewer	☐	landfill	☒	smoke/dust/fume
	☒	metals	☐	PCBs	☒	paints/surfacing
Particulates	☒	fibers	☒	diesel	☐	asbestos
Sampling	☐	acids	☐	bases		
Other Chemicals:	☒	benzene, toluene, ethylbenzene, xylene, sulfides, CO_2, liquid natural gas, methane, ethane, amine solutions, inert/ cryogenic bulk gases, inorganic acids and alkalis, chlorofluorocarbons, organic corrosives, etc				

REQUIRED PERSONAL PROTECTIVE EQUIPMENT (PPE) (CHECK ALL THAT APPLY)

Feet:	☐	safety boots	☒	steel-toe boots	☐	shank
	☐	rubber boots	☐	waders		
Gloves:	☒	leather	☐	cotton	☐	cut-resistant
	☐	chemical resist	☐	disposable		
Body:	☐	safety vest	☐	pfd	☐	harness
	☐	tyvek	☒	flame retardant	☐	coveralls
Eyes:	☒	safety glasses	☒	sunglasses	☐	goggles
Head:	☒	hard hat	☒	hearing protection	☒	respirator

OTHER REQUIRED SAFETY EQUIPMENT/TRAINING

☐	dosimetry	☒	communication	☐	decontamination
☒	first aid kit	☐	fire extinguish	☐	flares
☐	chains/studs	☒	eye wash/shower		

☐	24 hr HAZWOPER	☐	40 hr HAZWOPER	☐	HAZWOPER Annual Refresher
☐	TLD Program	☒	RPP Program	☒	Medical Surveillance
☒	1st Aid/CPR	☒	Other: 1) 24hr EPA H&S Training; 2) 8hr EPA H&S Refresher; 3) Defensive Driving Training (every 3yrs); 4) Respirator Fit test/training		

COMMENTS:

Personnel may be potentially exposed to various chemicals while inspecting process equipment, piping, storage areas, pollution control devices, tanks, and treatment systems. Chemicals may include, but are not limited to: organic chlorinated and non-chlorinated solvents; bulk flammable, combustible, toxic/corrosive, or inert/cryogenic gases; petroleum fuels; petroleum and non-petroleum oil substances; chlorofluorocarbons, inorganic acid and alkaline liquids; metallic and non-metallic mineral solids; and, organic corrosives. Air sampling data is usually not available to document potential inhalation exposures, so personnel should minimize time spent in areas where hazardous materials are stored or used. Physical hazards may include loud noise, dust, smoke, and vibration from heavy equipment and machinery, noxious odors, forklift and other vehicular traffic, and occasionally, non-ionizing radiation from industrial lasers. Personnel may be exposed to hazardous noise levels at or above 85 dBA, and are required to wear ear plugs and/or muffs while observing or inspecting areas with hazardous noise. Sources of hazardous noise may also generate noticeable vibration. Such sources include heavy equipment and machinery, and large motors, compressors and pumps which may be located in semi-enclosed structures. Personnel may be exposed to smoke, dust and fumes from material stockpiles, moving and handling equipment, and process equipment. When such conditions are anticipated, personnel are advised to stay upwind of these sources. Outdoor inspections may occur during all types of weather conditions, including extreme heat, cold, or high wind. Thermal stress is the most serious potential hazard; therefore, personnel must ensure adequate hydration and wear appropriate attire and field gear when conducting outdoor site inspections. Inspection acitivies may be conducted on various terrains and in remote locations where pits, holes, and trenches may be encountered. Poisonous insects, plants, and snakes may be present. Personnel should be aware of their surroundings and take evasive actions to avoid contact with such hazards. For inspections where air monitoring is conducted, personnel are required to wear full-face respirators when in close proximity to air emission sources. Although personnel approach these sources from upwind, the wind direction could change at any time and potential inhalation hazards may be present. **REFER TO PPE HAZARD ASSESSMENT FORM FOR SPECIFIC EXPLANATION OF HAZARDS ASSOCIATED WITH THIS JOB HAZARD ANALYSIS.**

CERTIFICATION OF HAZARD ASSESSMENT

SUPERVISOR:	DATE: 12-10-14	SAFETY/HEALTH REPRESENTATIVE:	DATE: 12-9-14

PPE Hazard Assessment Form

HEALTH AND SAFETY HAZARDS

	mical Hazards	Description/Mitigation Methods
	Vapors/gases	Personnel may be potentially exposed to various chemicals while inspecting process equipment, piping, storage areas, pollution control devices, tanks, and treatment systems. Chemicals may include, but are not limited to: organic chlorinated and non-chlorinated solvents; bulk flammable, combustible, toxic/corrosive, or inert/cryogenic gases; petroleum fuels; petroleum and non-petroleum oil substances; inorganic acid and alkaline liquids; metallic and non-metallic mineral solids; and, organic corrosives.
X	Dusts/mists/fumes	Personnel may be exposed to smoke, dust and fumes from material stockpiles, moving and handling equipment, and process equipment.
X	Liquid splash	Same as for vapor/gases
X	Other	Physical hazards may include loud noise, dust, smoke, and vibration from heavy equipment and machinery, noxious odors, forklift and other vehicular traffic, and occasionally, non-ionizing radiation from industrial lasers.

Comments: (potential hazards associated with air monitoring)

Personnel may scan emission sources using the FLIR camera to determine if leaks/plumes are present. If leaks are observed, personnel approach the unit from upwind to limit potential inhalation exposures. VOC sensors and/or toxic vapor analyzers (Photoionization Detectors) are to be carried into the field and used whenever the inspector has knowledge, based on their best professional judgment or when so advised by the SHEMP manager, that monitoring may be needed. This prior knowledge of potential contaminants should be obtained by a thorough review of the following prior to site entry:

1. Previous case history of the site from previous EPA inspections
2. Knowledge obtained from interviewing other inspectors who had gone to this site
3. SIC code lookups
4. Company history on either the EPA site or Industry internet search
5. Past EPCRA reporting
6. Companies that have a history of past releases
7. Chemical inventories obtained from the company
8. Industrial hygiene data obtained from the company.

If exposures are expected at any time that would be ½ of the TLV or PEL (whatever is more conservative) or if monitoring equipment (carried into the field) indicates exposures at greater than or equal to this "action limit", then the inspector is required to don their full-face air purifying respirator, with chemical-specific cartridges, during the inspection or evacuate the area immediately.

	sical Hazards	Description/Mitigation Methods
X	Ergonomics	Personnel may experience repetitive motion or prolonged awkward positions during observations. Additional tasks during monitoring may include infrequent lifting, pushing, pulling, or carrying of heavy objects. Vibration, heat or cold may add risk to these work conditions. The level of risk depends on the intensity, frequency, and duration of the exposure to these conditions. Breaks at regular intervals, careful lifting techniques, secure grip on equipment items, and packing at desk level or higher will reduce potential exposure risk.
X	Heat —high temperatures	Employees engage in field activities during all types of weather conditions, including extreme heat. Thermal stress is the most prevalent potential hazard. Personnel must ensure adequate hydration and wear appropriate field gear while engaging in inspection activities. Other potential sources of heat hazards include areas where welding, metal fabrication, or metal melting occurs, heated storage vessels, steam lines, and combustion exhausts ducts.
X	Cold —cold temperatures	Employees engage in field activities during all types of weather conditions, including extreme cold. Although inspections are typically performed in temperate climates, exposure to freezing cold may be a potential hazard. Therefore personnel must ensure adequate hydration and appropriate field gear (layers, protecting the extremities especially fingers, toes, nose, and ears) is worn while engaging in emergency response activities. Personnel should be trained on the signs and symptoms of frost bite and hypothermia and understand corrective measures to take.
X	Fire	Due to the nature of industrial facilities, potential fire or explosions hazards are possible. Personnel should follow site-specific fire safety and emergency response procedures for evacuation as the situation dictates. In addition, EPA staff should always accompanied by site personnel.
X	Electricity	Industrial sites have various electrical systems. Employees may be exposed to potential electrical hazards during inspection activities, depending upon the type of facility equipment and processes. Personnel should adhere to site-specific safety measures to avoid electrical hazards as the situation dictates. Maintain a safe distance from all electrical components. If exposed lines are present, do not touch any metal objects/equipment nor stand in nearby pools/puddles of water. In addition, EPA staff should always accompanied by site personnel.
X	Radiation — ionizing, non-ionizing	Personnel may occasionally inspect facilities where potentially hazardous industrial lasers are used for specific purposes, such as thickness gauging, distance measurement, cutting, or penetration. Such devices typically are shielded and have warning symbols posted. Damage to eyes or local skin burns are the potential hazards. Personnel should maintain adequate distance from industrial lasers in accordance with site specific safety procedures and direction by site personnel.
X	Noise and vibration	Personnel may be routinely exposed to hazardous noise levels above 85 dB during site inspections. Sources of hazardous noise may also generate noticeable vibration. Such sources include heavy equipment and machinery, and large motors, compressors and pumps which may be located in semi-enclosed structures. Employees are required to wear ear plugs and/or muffs when conducting inspection activities around hazardous noise sources. Employees should minimize time spent in areas with high vibration levels to avoid symptoms of motion sickness or dizziness.

PPE Hazard Assessment Form

HEALTH AND SAFETY HAZARDS		
X	Slips/Trips/Falls	Slips/trips/falls are always likely when walking walking through an industrial plant. In addition, many of the field acitivies are conducted outside where pits, holes, and various terrains are encountered. Personnel need to be cognizant of their surroundings, utilize steel-toed boots with sufficient tread, and take evasive actions to avoid contact with such hazards.
X	Elevation - Falls	Personnel may climb stairways or enter catwalks to access tanks, vessels and equipment higher than ground level to observe and inspect the condition of such sources. Personnel should exercise caution when climbing ladders or stairways, and ensure that these are equipped with approriate handrails and other safeguards. Personnel must inspect stairways/walkways to ensure structural integrity and/or question site personnel regarding structural stability prior to climbing. Personnel are not to climb ladders.
X	Other	Vehicle accidents and traffic are potential hazards encountered while driving to and from, and walking within, large industrial facilities. Personnel are required to take Defensive Driving Training every 3yrs, and should be cognizant of internal and external vehicle traffic (e.g. forklifts, golf carts, earth-movers, 18-wheek trucks etc) when moving throughout an industrial site during inspections.
Biological Hazards		**Description/Mitigation Methods**
X	Animals/Insects	Employees may encounter poisonous insects and snakes in outdoor locations during site inspections. Personnel need to be cognizant of their surroundings and take evasive actions to avoid contact with such hazards. Wearing long sleeves and other protective clothing is recommended when such outdoor conditions are anticipated to reduce potential exposures.
X	Other	Employees conducting inspections in outdoor locations may encounter poison ivy and other poisonous plants. Personnel must be trained to recognize common poisonous plants. In the field, employees should be aware of their surroundings, and evade areas which may have poisonous plants to prevent injury/illness. Cut-resistant gloves, long sleeves and other protective clothing are recommended when such outdoor conditions are anticipated to reduce potential exposures.

Completed by: Kendra Gomez & Diana Lundelius **Date:** May 19, 2011
Updated by: Kendra Mask **Date:** December 19, 2019
SHEMP Review KendraMask **Date:** 12/19/19

Required Personal Protective Equipment (PPE)

Where engineering and administrative controls are not feasible or sufficient for controlling hazards, PPE must be used to protect workers. The following PPE is required for the noted tasks above:

Eye and Face Protection			
X	Safety glasses with side shields		Reflective goggles/face shield
	Chemical splash goggles		Cutting/brazing/welding eye protection
	Face shield	X	Other: Sunglasses
Head Protection			
X	Hard hat, bump cap		Helmet, cowl, hood
	Welding helmet/mask		Other:
Foot Protection			
X	Steel-toed safety boots		Other:
	Chemical-resistant boots		
Body Protection			
	Apron (splash, work)		Head-reflective garments
	Lab coat		Sleeves (cut-resistant)
X	Coveralls (work, chemical-resistant) Hazard Type: Fire Type coverall: Nomex	X	Other: Appropriate field gear for the weather (thermal/cold stress), long sleeves and other protective clothing if poisonous insects/snakes/plants may be encountered
Respiratory Protection			
X	Respirator (situational dependant)	X	Type of respirator: Full-Face with GMC-H cartridges
Hand Protection			
	Rubber insulating gloves		Rubber insulating sleeves
	Rubber insulating hoods	X	Other: Leather Work Gloves

Other:

Ear plugs and/or muffs

Sunscreen (*personal issue item)*

Insect repellent (*personal issue item)*

Personnel are not authorized to wear contact lenses during inspections due to potential reaction with chemical vapors. Prescription safety glasses are available through the R6 Health & Safety Office.

HEALTH & SAFETY TRAINING REQUIREMENTS

EPA employees (without HAZWOPER training) must have at a **minimum** the following:

Course Name	Training Location	Training Frequency
24hr EPA H&S Training for Field Activities (OTH 952)	FedTalent	Initial – One time
8hr EPA H&S Training for Field Activities Refresher (OTH 952) that includes the following modules: • EPA's Occupational Health and Safety Program • Planning and Preparation for Field Activities • Hazard Communication • Chemical Hazards & Reactions • Basic Toxicology • Occupational Noise • Heat and Cold Stress • Human Factors/ Ergonomics • Natural Hazards • Personal Protective Clothing and Equipment • Ladders & Climbing	FedTalent	Annual
Defensive Driving	GSA Website	Every 3yrs
First Aid/CPR	In-Class	Every 2yrs
Respirator Fit Test & Training	SHEMP Manager	Annually

EPA employees who **maintain HAZWOPER certification** are required to have the following:

Course Name	Training Location	Training Frequency
24/40 hr HAZWOPER Training	In-Class	Initial – One time
8hr HAZWOPER Refresher	In-Class	Annual
Defensive Driving	GSA Website	Every 3yrs
First Aid/CPR	In-Class	Every 2yrs
Respirator Fit Test & Training	SHEMP Manager	Annually

OCCUPATIONAL MEDICAL SURVEILLANCE PROGRAM

All employees under this JHA will be assigned to the Clean Air Act Inspector/Enforcement Officer Work Order (040).

GENERAL INDUSTRIAL AIR INSPECTIONS

I HAVE READ OR BEEN BRIEFED ON THE HAZARDS AND PROTECTIVE MEASURES IDENTIFIED FOR THE ABOVE-LISTED TASKS AND FULLY UNDERSTAND THE JOB-SPECIFIC REQUIREMENTS THAT HAVE BEEN ESTABLISHED.

DATE	EMPLOYEE NAME	EMPLOYEE SIGNATURE	EMPLOYER NAME
12/10/14	Greg Valentine		R6 U.S. EPA KCG 6/6/17
12/10/14	Charles W Hendrick		LEPA Agency 12/15 R6 EPA KCG
12-10-14	DIANA LUNDELIUS	Diana Lundelius	R6 EPA
12/10/2014	Cynthia J Kaleri	Cynthia J Kaleri	R6 EPA
12/10/2014	JOHN L JONES		R6 EPA GEN-AA KCG 6/6/17
12/10/2014	RAYMOND MAGYAR		R6 GEO-AA KCG 6/12/15
12/10/14	Donald M Smith		R6 EPA KCG 6/6/17
12/10/14	Samuel Tates	Samuel Tates	R6 EPA
12/10/14	David Eppler	David Eppler	R6 EPA KCG 1/6/15
12/11/14	Tony Robledo	Tony Robledo	R6 EPA
12/11/14	Dorothy Crawford		R6 EPA GEN KCG 1/20/16
12/11/14	Clint Rachal		EPA R6 KCG 6/6/17
12/16/14	Emad Shahin	Emad Shahin	EPA - R6
12/16/14			
12/16/14	Lawrence Craig Lutz		EPA R6 KCG 6/6/17
12/16/14	James Leathers		EPA - R6
12-16-14	Dominique Duplechain		R6 EPA LEPA Agency 12/15 KCG
12/16/14	DEBBIE FORD		EPA - R6
05/04/15	Mark Steed		EPA - R6 KCG 11/12/16
11/5/15	Sarah Frey		EPA - R6
11-5-15	Lisa Schaub		EPA R6 KCG 11/8/1
11-5-15	Justin Chen		EPA R6
11-5-15	Bridget Weir	Bridget Weir	EPA R6

GENERAL INDUSTRIAL AIR INSPECTIONS

I HAVE READ OR BEEN BRIEFED ON THE HAZARDS AND PROTECTIVE MEASURES IDENTIFIED FOR THE ABOVE-LISTED TASKS AND FULLY UNDERSTAND THE JOB-SPECIFIC REQUIREMENTS THAT HAVE BEEN ESTABLISHED.			
DATE	EMPLOYEE NAME	EMPLOYEE SIGNATURE	EMPLOYER NAME
11/12/15	PRINCE NTODZO		EPA R6
11/16/15	Brandon Bammel		EPA R6
12/10/15	Kevin J. Kim		EPA R6
12/01/14/16	Kayla Buchanan		EPA R6
10/13/16	James Haynes		EPA R6
11/19/19	Aimee Ross		EPA R6
01/15/20	Ben Rosenthal		EPA R6
7/20/2021	Jamie Salabogi		EPA R6
08/26/2021	Colleen McCarthy		EPA R6
08/27/2021	Daniel Williams		EPA R6

GENERAL INDUSTRIAL AIR INSPECTIONS

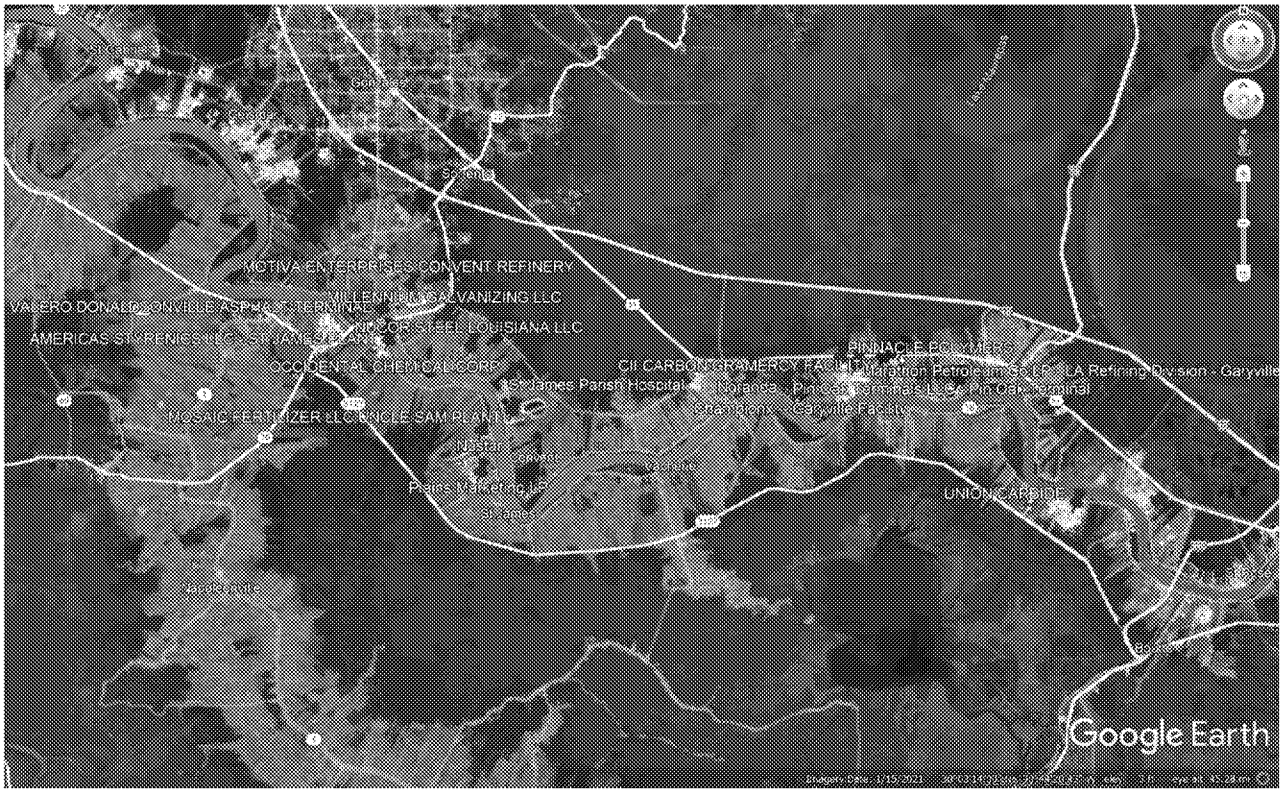
I HAVE READ AND UNDERSTAND THE HAZARDS AND PROTECTIVE MEASURES IDENTIFIED FOR THE ABOVE LISTED TASKS AND TRULY UNDERSTAND AND AGREE TO FOLLOW THE MEASURES THAT HAVE BEEN ESTABLISHED.

DATE	EMPLOYEE NAME	EMPLOYEE SIGNATURE	EMPLOYER NAME
11/12/15	PRINCE NFODZO		EPA R6
11/16/15	Brandon Bammel		EPA R6
12/10/15	Kevin J. Kim		EPA R6
1/01/14/16	Kayla Buchanan		EPA R6
10/13/16	James Haynes		EPA R6
6/6/17	Jim Gold		EPA R6

Saint John the Baptist and Saint James Parish:

Map of Potential Facilities in St. John the Baptist and St James to be monitored with the GMAP and Yellow pin indicating the location of the Hospital.

St. James Parish Hospital
1645 Lutcher Ave, Lutcher, LA 70071
+1-225-869-5512



Lists by Parish of facilities for potential inspector entry. Any inspector entry will be noted on the addendum to the HASP, documenting entry was made.

St. James Parish
Motiva Enterprises Convent Refinery
Cii Carbon Gramercy Facility
Mosaic Fertilizer Llc - Uncle Sam Plant
Americas Styrenics Llc - St James Plant
Occidental Chemical Corp
Valero Donaldsonville Asphalt Terminal
Mosaic Phosphates Co Faustina Plant
Noranda Alumina Llc
NuStar St. James Terminal

Nucor Steel Louisiana Llc
Millennium Galvanizing Llc
Plains Marketing LP

St. John the Baptist
Denka Performance Elastomer Llc
Evonik Corp - Reserve Plant*
Marathon Petroleum - Garyville Refinery
Dupont Pontchartrain Site
Championx -- Garyville Facility (current owner) Previous owner as of May 22, 2020-Nalco Company Llc- Garyville Facility (Previous owner)
Pin Oak Terminals
Dpc Enterprises Lp
Clariant Corp
Pinnacle Polymers LLC Polypropylene Manufacturing Plant
Union Carbide (St. Charles)

Calcasieu Parish:

Map of Potential Facilities in Calcasieu to be monitored with the GMAP and Yellow pin indicating the location of the Hospital.

CHRISTUS Ochsner Lake Area Hospital
4200 Nelson Rd, Lake Charles, LA 70605
+1-337-474-6370

Calcasieu
Sasol Chemicals Usa Llc
Lotte Chemical MEG co-located with LACC Ethylene Plant
Eagle Us 2 Llc, Lake Charles Plant
Citgo Petroleum Corp
Phillips 66 Lake Charles Refinery
Louisiana Integrated Polyethylene Jv, Llc
Westlake Chemical OpCo LP
Grace Davison Catalysts Plant
Axiall LLC Westlake may show as Georgia Gulf Lake Charles
Arch Chemicals Inc
Equistar Chemicals LP - Lake Charles Polymers Site

EPA COVID-19 Job Hazard Analysis (JHA) Supplement, July 6, 2020, Final

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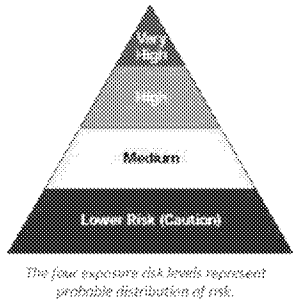
1. Introduction

- The COVID-19 Public Health Emergency is very dynamic. Federal, state and local government guidance is updated frequently. There may be new CDC, OSHA or EPA guidance that will impact the current content of this JHA prior to the next update. As a result, *it is important to review the government links in this JHA for new information*. Additionally, due to possible differences in state or local health department requirements on COVID-19, the employee, supervisor and the SHEMP manager should review applicable state/local requirements before traveling and deployment to a site. These state/local requirements may be more flexible for essential workers that are traveling into the area, and EPA travel for field work may qualify as such essential travel.
- Prior to travel, assess the prevalence for COVID-19 cases in the area(s) you are traveling to (and through) in addition to where you will be performing site work. This assessment should include evaluation of whether the area has demonstrated a downward trajectory of positive tests and documented cases within a 14-day period. Including this will help staff determine how to "assess the prevalence.".
- Specific COVID-19 information can be found on state/territorial/local government and health department websites. Available sources include the CDC COVID-19 Tracker, Johns Hopkins University Coronavirus Resource Center[1], the COVID Tracking Project[1] , the U.S. Census Bureau's Coronavirus (COVID-19) Pandemic Site and other expert sources. EPA also developed the EPA Facility Status Dashboard aid in facility reopening decisions. The Dashboard provides information on the status of each gating criterion in the commuting area surrounding our facility locations.
- Employees in consultation with their supervisor and SHEMP manager should use this JHA Supplement as a template to address COVID-19 health concerns. The Agency recommends this JHA Supplement be used for all field work until such time that the COVID-19 public health emergency is over.

2. OSHA Worker Exposure Risk to COVID-19, Summary

[1] Non-federal sites are included for informational purposes only and do not constitute any endorsement by EPA or its employees.

OSHA Guidance on Preparing Workplaces for COVID-19 provides four COVID-19 exposure risk categories. The use of the term "workers" below includes EPA field staff that are on location or in transit to facilities/sites or field locations.:



Occupational Risk Pyramid for COVID-19

- **Very High Exposure Risk**
  - Very high exposure risk jobs are those with high potential for exposure to known or suspected sources of COVID-19 during specific medical, postmortem, or laboratory procedures.
  - Workers in this category include:
    - Healthcare workers (e.g., doctors, nurses, dentists, paramedics, emergency medical technicians) performing aerosol-generating procedures on known or suspected COVID-19 patients.
    - Healthcare or laboratory personnel collecting or handling specimens from known or suspected COVID-19 patients (e.g., manipulating cultures from known or suspected COVID-19 patients).
    - Morgue workers performing autopsies, which generally involve aerosol-generating procedures, on the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death.
  - Personal Protective Equipment (PPE):
    - Most workers at very high exposure risk likely need to wear gloves, a protective suit, a face shield or goggles, and either a face mask or a respirator, depending on their job tasks and exposure risks.
    - Those who work closely with (either in contact with or within six feet of) people known to be, or suspected of being infected with COVID-19, should wear respirators.

- **High Exposure Risk**
  - High exposure risk jobs are those with high potential for exposure to known or suspected sources of COVID-19.
  - Workers in this category include:
    - Healthcare delivery and support staff (e.g., doctors, nurses, and other hospital staff who must enter patients' rooms) exposed to known or suspected COVID-19 patients.
    - Medical transport workers (e.g., ambulance vehicle operators) moving known or suspected COVID-19 patients in enclosed vehicles.
    - Mortuary workers involved in preparing (e.g., for burial or cremation) the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death.
  - Heightened Engineering Controls, Administrative Controls and Safe Work Practices Recommended (Discuss with SHEMP Manager)
  - PPE:

        - Most workers at high exposure risk need to wear gloves, a protective suit, a face shield or goggles, and either a disposable surgical mask or a respirator, depending on their job tasks and exposure risks.
        - Those who work closely with (either in contact with or within 6 feet of) people known to be, or suspected of being, infected with COVID-19 and **should wear assigned respirators**.

- **Medium Exposure Risk**

    - Medium exposure risk jobs include those that require frequent and/or close contact with (i.e., within six feet of) people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients. In areas without ongoing community transmission, workers in this risk group may have frequent contact with travelers who may return from locations with widespread COVID-19 transmission. In areas where there is ongoing community transmission, workers in this category may have contact with the general public (e.g., in schools, high-population-density work environments, and some high-volume retail settings).
    - Engineering Controls - Install physical barriers, such as clear plastic sneeze guards, where feasible.
        - Administrative Controls: Consider offering disposable surgical masks to ill employees to contain respiratory secretions until they are able leave the workplace (i.e., for medical evaluation/care or to return home).
        - Where appropriate, limit public's access to the worksite, or restrict access to only certain workplace areas.
        - Consider strategies to minimize face-to-face contact (e.g., drive-through windows, phone-based communication, telework).
    - PPE:
        - Workers with medium exposure risk may need to wear some combination of gloves, protective suit, a disposable surgical mask, and/or a face shield or goggles.
        - PPE ensembles for workers in the medium exposure risk category will vary by work task, the results of the employer's hazard assessment, and the types of exposures workers have on the job.
        - In the event of a shortage of masks, a reusable face shield that can be decontaminated may be an acceptable method of protecting against droplet transmission. Ensure that when using a face shield it covers the entire face (extends to the chin or below and reaches the sides of the face).
    - **Note that a respirator is not recommended for jobs classified at medium risk**, unless it is part of the PPE normally recommended as part of the hazard assessment.

- **Lower Exposure Risk (Caution)**

    - Lower exposure risk (caution) jobs are those that do not require contact with people known to be, or suspected of being, infected with SARS-CoV-2 nor frequent close contact with (i.e., within six feet of) the general public. Workers in this category have minimal occupational contact with the public and other coworkers.
    - Engineering Controls & Administrative Controls

- Additional engineering controls are not recommended for workers in the lower exposure risk group. Employers should ensure that engineering controls, if any, used to protect workers from other job hazards continue to function as intended.
- Monitor public health communications about COVID-19 recommendations and ensure that workers have access to that information. Frequently check the CDC COVID-19 website: www.cdc.gov/coronavirus/2019-ncov.
- Collaborate with workers to designate effective means of communicating important COVID-19 information

o PPE

- Additional PPE is not recommended for workers in the lower exposure risk group.
- Workers should continue to use the PPE, if any, that they would ordinarily use for other job tasks.
- **Note that a respirator is not recommended for jobs classified at low risk,** unless it is part of the PPE normally recommended as part of the hazard assessment.

3. Pre-Travel Considerations

For pending site work, identify individuals who indicate:

a) Feeling well and show no signs of illness.
b) Not exhibiting any COVID-19 symptoms listed by the CDC, including, but not limited to fever, cough, shortness of breath, or difficulty breathing.
c) No contact with known or presumptive COVID-19 positive individual(s) in past 48 hours. Employees who have been in direct contact with a COVID-19 affected person must notify their supervisors.
d) Completed self-quarantine if recent known or suspected exposure to COVID-19 (Follow CDC guidance on discontinuation of isolation).
e) Willing to be onsite for project duration, wear face covering (e.g., cloth face covering, disposable surgical mask) or respirator (when required) and social distance, etc.
f) The employee, supervisor and the SHEMP manager should consider when EPA employees are traveling from a population center with COVID-19 cases to a population/community with fewer cases as part of the hazard assessment. Not only is there a risk of EPA staff becoming exposed to COVID-19 during fieldwork, but EPA employees could transmit COVID-19 to communities that they visit. Since many of the EPA offices are in the largest cities in their Region with COVID-19 cases, EPA staff traveling to other communities could pose a risk to those communities that may outweigh the benefit of the fieldwork. Some state/local governments may impose restrictions on outsiders traveling into their jurisdiction, and EPA staff should comply with those restrictions. The state/local restrictions may be more flexible or not apply to essential work such as EPA field work.

4. EPA COVID-19 JHA Supplement Instructions:

a) Complete all information as requested on the form below, such as supervisor/SHEMP name and signature; date of JHA, JHA number, name of activity, department, location and other information (name of participating employees other than the supervisor).
b) Review the existing JHA for the task, the OSHA COVID-19 risk levels above, and the listed PPE. Check off any that apply to this job's tasks.
c) For task steps considered OSHA Medium, High and Very High risk, list out the basic task steps, the actual COVID-19 hazard, and the projected hazard control (PPE, engineering control, administrative control).
d) Note that some but not all possible hazards are listed at the bottom of the first page, along with some possible controls.
e) Note that under the box containing the checklist of PPE is a section that documents that engineering controls and administrative controls were considered and review this section after completing the rest of the JHA.
f) Make sure to list all feasible engineering and administrative controls being considered. If they are not feasible, list the reason(s).
g) Complete the column for Basic Tasks or Steps for the job being performed. It is not necessary to list minor insignificant steps or non-COVID-19 related hazards (Non-Covid-19 hazards are included in the original JHA).
h) Complete the column for Corrective Action or Hazard Controls for each Task or Step listed. Make sure to list specific control methods such as engineering controls, administrative controls and specific PPE.
i) Consider other additional risk such as working indoors, tight spaces, performing strenuous activity or working in high heat and/or humidity environments.

Points to remember: This is to be used as a supplement to existing JHAs to document important controls for COVID-19 related hazards that may be present during specific work tasks. A supervisor and employee that performs the job should complete this form together; to ensure they agree as to the actual steps involved in this job, in conjunction with the local SHEMP Manager.

5. EPA COVID-19 Job Hazard Analysis (JHA) Supplement - Template

	Job Hazard Analysis (JHA) **COVID-19 Supplement**	**Supervisor Name:**	James Leathers
		Supervisor Signature:	
		SHEMP Manager Name:	Kendra Mask
		SHEMP Manager Signature:	
		Date: 4.5.22	
Job/Activity Name: COVID-19 Supplement – Attach the job specific JHA used for the job task to this supplemental JHA to document the OSHA risk level provided below for the job.		**JHA #:** COVID Supplement to existing JHA (please attach)	
Division/Branch: CAED/Air Enforcement	**Area /Location(s)**: Various industrial facilities in St John the Baptist, St James, and Calcasieu Parishes.	**Other Information** (JHA participating employees): James Haynes Benjamin Rosenthal Sarah Frey	

REQUIRED PERSONAL PROTECTIVE EQUIPMENT FOR ENTIRE JOB

☒ Appropriate Basic PPE (Safety glasses, safety shoes, hard hat, gloves) See Attached JHA

☐ Safety glasses	☐ Respirator, Type _____	☐ Welding gloves/ leathers	☐ Safety shoes
☐ Goggles	☐ Hard hat	☐ Protective suit	☐ Other rubber boots_____
☐ Face shield	☐ Hearing protection	☐ Lab Coat &/or Apron	☐ Portable GFCI
☐ Disposable surgical mask	☐ Appropriate gloves	☐ Fall protection	☐ High visibility vest
☐ Other_____	☐ Other_____	☐ Other_____	☐ Other_____

Follow the steps outlined in the EPA Self-Assessment to Stop the Spread of COVID-19 tool to make sure employees are not ill or symptomatic. Perform this self-assessment prior to departing and daily before reporting to work.

Always consider Engineering or Administrative Controls before use of PPE. These controls were considered: ☒YES, ☐NO, if not feasible explain why:

Basic Tasks or Steps	Hazards	Corrective Action or Hazard Controls
1. Vehicle Travel	Contact with person infected with COVID-19, potential spread to others (**Note:** Same hazard for all activities)	a) For EPA or rental vehicle, follow EPA Disinfection Guidance (EPA OMS-SSD Vehicle Utilization, Cleaning, and Disinfecting Recommendations 4/27/20). b) Obtain adequate EPA-registered disinfectants and hand sanitizers for duration of project (vehicle disinfection kits) from Regional or Program equipment/supply managers. c) Clean and disinfect "common touch" vehicle surfaces, e.g., door handles, console, touch screen, steering wheel, inside of door, before and after use. Disinfect/sanitize before and after use by new driver. d) For EPA-owned or rental vehicle, document name and date of initial disinfection/sanitization. e) Travel should be limited to one person per vehicle. If the project requires multiple personnel in one vehicle, don cloth face covering or disposable surgical mask, maximize outside air flow and attempt to separate occupants by at least six feet. f) Minimize fuel fill-ups: wear nitrile gloves and use cloth face cover or disposable surgical masks, when within six-feet of another person; if not wearing gloves, use disinfectant wipe on gas station touch screen before and after use.
2. Accommodations		a) Attempt to secure hotel room with an in-room kitchen or microwave oven and refrigerator. b) If an in-room kitchen or in-room microwave/refrigerator is available, purchase groceries once a week and cook meals in the hotel room. c) If in-room facilities are not available, consider meal delivery service, takeout, or curbside pickup. d) Eating inside of restaurants should be avoided. e) Avoid hotel breakfast buffets, bulk serving containers, and shared service items. f) Disinfect own room with an EPA List N approved disinfectant. g) Use "No Housekeeping" sign to limit access to hotel room.
3. Site Work		a) Follow the steps outlined in the EPA Self-Assessment to Stop the Spread of COVID-19 tool or similar questionnaire to make sure employees are not ill or symptomatic. Workers should be directed to contact the Site Supervisor or Safety Officer if they answer yes to any of these questions. Perform this or similar self-assessment daily before reporting to work.

Basic Tasks or Steps	Hazards	Corrective Action or Hazard Controls
Site Work, continued	Contact with person infected with COVID-19, potential spread to others (**Note:** Same hazard for all activities)	b) EPA Site Supervisor or designee has the responsibility for ensuring that personnel with COVID-19 symptoms do not come onsite. c) The Site Safety Officer should make daily observations of COVID-19 safety compliance and consider monitoring response workers for symptoms. d) Use electronic sign-in (spreadsheet, SharePoint site, etc. Avoid use of clipboard and pen). e) Conduct daily health status screening of site personnel (Follow OSHA recordkeeping requirements). f) If screening is performed, include a non-contact temperature check, e.g. forehead thermometer, and seek guidance from a public health department or healthcare professional on how to implement a health status screening and temperature screening program. g) Require face coverings for all indoor and outdoor operations when social distancing cannot be consistently maintained. h) Require face coverings for all outdoor operations where social distancing cannot be consistently maintained. Similar to administrative and engineering controls implement during Level A, B and C PPE use, if the face covering causes a hazard to a worker (e.g. heat and physical stress while performing strenuous work), implement administrative or engineering controls to limit the hazard caused by the face covering. If field activities prevent social distancing (e.g. assisting in donning and doffing of PPE, composite water sampling), use of a cloth face covering is recommended. i) Even when social distancing is maintained, EPA recommends following the respective state or local jurisdiction. j) Site personnel should always routinely carry a small container of hand sanitizer with at least 60% alcohol, a face covering that covers the nose and mouth, and nitrile gloves. k) In indoor residential environments, site personnel cannot control actions of resident(s). Face coverings are required for all work in residential properties. Site personnel should avoid surface contact whenever possible and should wear nitrile gloves. With the permission of residents, site personnel should wipe down all surfaces that were touched by them before departing residence. l) For site work that involves multiple locations, disinfect or replace equipment, PPE, and personal items before moving to next location. m) Do not shake hands. Use other forms of non-contact greeting. n) Avoid touching face.

Basic Tasks or Steps	Hazards	Corrective Action or Hazard Controls
Site Work, continued	Contact with person infected with COVID-19, potential spread to others (**Note:** Same hazard for all activities)	o) Site personnel should be attentive to handwashing upon arrival at the site, after exiting exclusion zone, prior to taking a break, prior to eating lunch, after use of the bathroom, using shared items and upon leaving the site for the day, etc. Encourage adherence to prescribed handwashing guidelines. p) Augment site handwashing equipment. Make sure soap and water handwashing facilities are readily available onsite. Do not rely on hand sanitizer alone. q) Avoid sharing items with others. This includes personal items such as pen and paper. r) When equipment must be shared (e.g., monitoring and sampling equipment), disinfect touch surfaces (following manufacturer's instructions) before providing to other individual for use and wear nitrile gloves. s) Whenever PPE such as protective suits, boots, air-purifying respirators are needed, attempt to don PPE without an attendant. If an attendant is needed, the attendant should wear a face covering and nitrile gloves. t) When trailers are necessary, separate smaller trailers are preferable to single large trailers in order to facilitate separate space and social distancing of personnel. u) When weather permits, store equipment outside to limit confinement of personnel and number of entries and exits from trailers. v) When possible, use Skype, MS Teams or other virtual communications tools to limit personnel meetings. w) Site trailers, command post, port-a-johns, handwash stations, etc. must be cleaned and disinfected with an EPA List N approved disinfectant daily or more frequently with high use, with special attention to common touch points. x) For rental of select items (e.g. port-a-johns), periodic disinfection may be included. When this is not the case, select site personnel will be designated with this responsibility. y) Do not share respirators or cartridges.

Basic Tasks or Steps	Hazards	Corrective Action or Hazard Controls
	Contact with person infected with COVID-19, potential spread to others (**Note:** Same hazard for all activities)	
If recommended actions indicated in this JHA are not being followed on-site, please point out importance of following JHA to non-compliant workers. Report any incidents of non-compliance to the Site Safety Officer and/or Site Supervisor.		

Comments: This JHA is a supplement to the standard JHA that has been previously completed for typical work activities and is to be used to establish the level of COVID-19 risk. This should be used with a site Health and Safety Plan, Field Work Control Plan, Vessel Float Plan, Dive Safety Plan, etc. The level of risk determined by using this form helps to identify if additional protective equipment or work practice controls are needed due to COVID-19 risk.

Addendum to the HASP.

Inspector's will identify any facilities where entry is made, documenting the name(s) of the inspectors. For each facility where entry is made, potential chemical hazards will be identified. A list of potential Chemical Hazards for all facilities is provided below.

Hazard Logs **Chemical**	**TLV®**	**NIOSH REL**	**PEL**	**IDLH**	**Route of Exposure**	**Acute Hazards / Symptoms**	**Odor Level**	**Odor/Visual Description**
1,3-Butadiene	TWA 2 ppm (suspected human carcinogen)	See NIOSH pocket Guide Appendix A, Potential Occupational Carcinogens	[1910.1051] TWA 1 ppm ST 5 ppm	Ca [2000 ppm] [10%LEL]	inhalation, skin and/or eye contact (liquid)	irritation eyes, nose, throat; drowsiness, dizziness; liquid: frostbite; teratogenic, reproductive effects; [potential occupational carcinogen]	0.45 ppm	Colorless gas with a mild aromatic or gasoline-like odor. [Note: A liquid below 24°F. Shipped as a liquefied compressed gas.]
Benzene	TWA 0.5 ppm STEL 2.5 ppm (A1 confirmed human carcinogen) (skin)	Ca TWA 0.1 ppm ST 1 ppm (potential occupational carcinogen)	[1910.1028] TWA 1 ppm ST 5 ppm (See NIOSH Pocket Guide Appendix F)	Ca [500 ppm]	Inhalation, skin absorption, ingestion, skin and/or eye contact	Nausea; dizziness; headaches; lassitude; skin, eye, and respiratory tract irritation	1 - 5 ppm	Colorless to light-yellow liquid with aromatic odor
Chloroprene	TWA 10 ppm STEL 2.5 ppm (potential occupational carcinogen)	Ca C 1 ppm (potential occupational carcinogen)	TWA 25 ppm (90 mg/m3) [skin] See Appendix G	Ca [300 ppm]	inhalation, skin absorption, ingestion, skin and/or eye contact	irritation eyes, skin, respiratory system; anxiety, irritability; dermatitis; alopecia; reproductive effects	Unknown	Colorless liquid with a pungent, ether-like odor
Cresol (mixed isomers)	All Isomers TWA 20 mg/m3 IFV [skin] (A4; Not classifiable	TWA 2.3 ppm (10 mg/m3)	TWA 5 ppm (22 mg/m3) [skin]	250 ppm	inhalation, skin absorption, ingestion, skin	Confusion, dizziness, nausea, weak pulse, skin, eye	0.003 - 5 ppm	Colorless, white, yellow, brown, or pinkish, oily

	as a human carcinogen)				and/or eye contact	burns; respiratory tract irritation, phenol odor on breath; headache; vomiting		liquids or solids with a sweet, tarry odor
Cyclohexane	TWA 100 ppm	TWA 300 ppm (1050 mg/m3)	TWA 300 ppm (1050 mg/m3)	1300 ppm [10%LEL]	inhalation, ingestion, skin and/or eye contact	irritation eyes, skin, respiratory system; drowsiness; dermatitis; narcosis, coma	780 ppm	Colorless liquid with a sweet, chloroform-like odor. [Note: A solid below 44°F.]
Diesel Oil (Fuel Oil #2)	TWA 100 mg/m3 [skin] (A3; Confirmed animal carcinogen with unknown relevance to humans)	N/A	N/A	N/A	Inhalation, ingestion, skin and/or eye contact	Eye, skin, and respiratory tract irritation; nausea; headache	Unknown	Amber to brown, slightly viscous liquid with strong hydrocarbon, kerosene-like odor
Ethyl benzene	TWA 20 ppm (A3: confirmed animal carcinogen with unknown relevance to humans)	TWA 100 ppm (435 mg/m3) ST 125 ppm (545 mg/m3)	TWA 100 ppm (435 mg/m3)	800 ppm [10%LEL]; AEGL-2, 30 min, 1600 ppm	inhalation, ingestion, skin and/or eye contact	irritation eyes, skin, mucous membrane; headache; dermatitis; narcosis, coma	2 - 200 ppm	Colorless liquid with an aromatic odor.
Ethylene	TWA 200 ppm	N/A	N/A	N/A	Inhalation (simple asphyxiant)	Faintness, excitation, drowsiness, incoordination, unconsciousness; contact with	76 ppm	Colorless gas with sweet odor; explosion hazard

						liquid causes freeze burns		
Ethylene Oxide	TWA 1 ppm	Ca TWA <0.1 ppm (0.18 mg/m3) C 5 ppm (9 mg/m3) [10-min/day] [potential occupational carcinogen]	TWA 1 ppm 5 ppm [15-minute Excursion] [potential occupational carcinogen]	Ca [800 ppm]	inhalation, ingestion, (liquid), skin and/or eye contact	irritation eyes, skin, nose, throat; peculiar taste; headache; nausea, vomiting, diarrhea; dyspnea (breathing difficulty), cyanosis, pulmonary edema; drowsiness, lassitude (weakness, exhaustion), incoordination; EKG abnormal; eye, skin burns (liquid or high vapor concentration); liquid: frostbite; reproductive effects; ; In Animals: convulsions; liver, kidney damage [potential	257 to 690 ppm	Colorless gas or liquid (below 51°F) with an ether-like odor

						occupational carcinogen]		
Gasoline	TWA 300 ppm; STEL 500 ppm; Confirmed Animal Carcinogen with Unknown Relevance to Humans	Carcinogen See NIOSH Pocket Guide Appendix A	none	Carcinogen [N.D.]; AEGL-2, 30 min, 7500 mg/m3	inhalation, skin absorption, ingestion, skin and/or eye contact	irritation eyes, skin, mucous membrane; dermatitis; headache, lassitude (weakness, exhaustion), blurred vision, dizziness, slurred speech, confusion, convulsions; chemical pneumonitis (aspiration liquid); possible liver, kidney damage; [potential occupational carcinogen]	0.3 ppm	Clear liquid with a characteristic, pungent aromatic odor
N-hexane	TWA 50 ppm	TWA 50 ppm (180 mg/m3)	TWA 500 ppm (1800 mg/m3)	1100 ppm [10%LEL]	inhalation, ingestion, skin and/or eye contact	irritation eyes, nose; nausea, headache; peripheral neuropathy: numb extremities, muscle weak; dermatitis; dizziness; chemical	130 ppm (poor warning)	Colorless liquid with a gasoline-like odor.

						pneumonitis (aspiration liquid)		
Naphthalene	TWA 10 ppm [skin] (A3: Confirmed animal carcinogen with unknown relevance to humans.)	TWA 10 ppm (50 mg/m3) ST 15 ppm (75 mg/m3)	TWA 10 ppm (50 mg/m3)	250 ppm	inhalation, skin absorption, ingestion, skin and/or eye contact	irritation eyes; headache, confusion, excitement, malaise (vague feeling of discomfort); nausea, vomiting, abdominal pain; irritation bladder; profuse sweating; jaundice; hematuria (blood in the urine), renal shutdown; dermatitis, optical neuritis, corneal damage	0.08 - 6.8 ppm	Colorless to brown solid with an odor of mothballs. [Note: Shipped as a molten solid.]
Polycyclic aromatic compounds or PAHs	N/A for group	N/A for group	N/A for group	N/A for group	Inhalation, ingestion, skin absorption	Dermal (skin), Hepatic (liver), immunological (immune system). Reasonably anticipated to be human carcinogens. Reproductive	N/A for group	N/A for group

						effects in animals.		
Propylene	TWA 500 ppm (A4; Not classifiable as a human carcinogen.)	N/A	N/A	N/A	Inhalation	Asphyxiation, dizziness, faintness, irregular heartbeat, contact with liquid causes freeze burns	76 ppm	Colorless gas with sweet odor
Toluene	TWA 20 ppm EL: 60 ppm	TWA 100 ppm (375 mg/m3) STEL 150 ppm (560 mg/m3)	TWA 200 ppm; Ceiling 300 ppm; 500 ppm (10-minute maximum peak)	IDLH 500 ppm; AEGL-2, 30min, 760 ppm	Inhalation, ingestion, skin absorption, skin and/or eye contact	Fatigue, lassitude (weakness, exhaustion) dizziness, headaches, paresthesia, lacrimation, confusion, dilated pupils, eye, and nose irritation	2 ppm	Colorless liquid with a sweet, pungent, benzene-like odor
Xylene (mixed isomers)	TWA 100 ppm STEL 150 ppm	TWA 100 ppm (435 mg/m3) ST 150 ppm (655 mg/m3)	TWA 100 ppm (435 mg/m3)	IDLH 900 ppm; AEGL-2 30min, 1300 ppm [>10% LEL]	Inhalation, ingestion, skin absorption, skin and/or eye contact	Eye, nose, and throat irritation; dizziness, excitement; drowsiness, staggering gait;	1 ppm	Colorless liquid with an aromatic odor

						nausea, vomiting		

Message

From: Schafer, Cynthia [Schafer.Cynthia@epa.gov]
Sent: 4/20/2022 2:10:29 PM
To: Zachary Good [Zachary.Good@erg.com]; Haynes, James [haynes.james@epa.gov]
Subject: RE: TD10 - LDAS Biweekly Team Agenda (04/20)

Sounds like we should cancel. The only update I have is that I'm working with Region 9 to get a Guideware database from Aera Energy. We've got a call next week with their LDAR contractor, so hopefully they can get us a .bak file in the next 2 weeks (they recently sent us 10 .csv files that appeared to be a combination of the Component, Inspection, and Repair tables and that just isn't going to work).

Just resent the invite for the technical call to you Zach.

Thanks,
Cindy

Cindy Schafer, P.E.
Environmental Engineer
U.S. Environmental Protection Agency
National Enforcement Investigations Center
Denver Federal Center, Building 25 | Denver, CO 80225
303-462-9310

From: Zachary Good <zachary.good@erg.com>
Sent: Wednesday, April 20, 2022 5:55 AM
To: Schafer, Cynthia <Schafer.Cynthia@epa.gov>; Haynes, James <haynes.james@epa.gov>
Subject: RE: TD10 - LDAS Biweekly Team Agenda (04/20)

Hi Cindy & James,

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By the way, that invite seems to have been lost somewhere. I know you updated it during our last call, James. Would you be able to look back at that and re-send it, if possible?

Thanks!
Zach Good
he, him, his
ERG - Chemical Engineer

Working Remotely – Ex. 6 Personal Privacy (PP)

From: Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>
Sent: Wednesday, April 20, 2022 7:52 AM
To: Zachary Good <zachary.good@erg.com>; Haynes, James <haynes.james@epa.gov>; Schafer, Cynthia <Schafer.Cynthia@epa.gov>
Cc: Burke, Shaun <Burke.Shaun@epa.gov>; Jason Sese <Jason.Sese@erg.com>; Young, Justin <Young.Justin@epa.gov>;

Matthew Heyward <Matthew.Heyward@erg.com>; George Wieber <george.wieber@erg.com>; Max Ke <max.ke@erg.com>
Subject: RE: TD10 - LDAS Biweekly Team Agenda (04/20)

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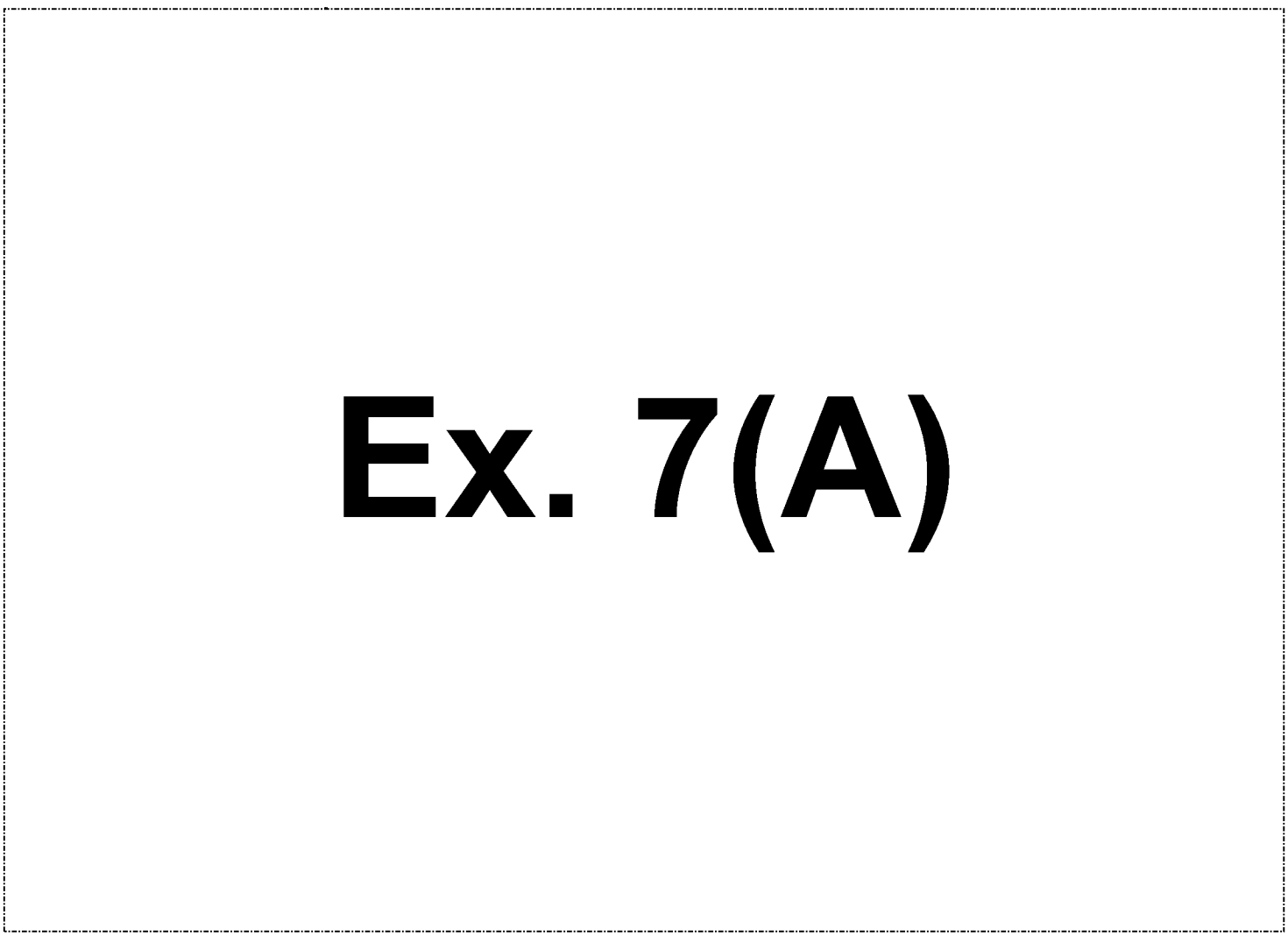
Subject: TD10 - LDAS Biweekly Team Agenda (04/20)

Enforcement Confidential

Good Morning Folks,

A proposed agenda for today's (04/20) LDAS team meeting is provided below. Let me know if there is anything that should be added or modified, and I can update accordingly.



Ex. 7(A)

4. Ex. 7(A)

Thank you,
Zach Good
he, him, his
Chemical Engineer

Working Remotely – Ex. 6 Personal Privacy (PP)

ERG
www.erg.com

Message

From: Zachary Good [zachary.good@erg.com]
Sent: 4/20/2022 2:37:14 PM
To: Schafer, Cynthia [Schafer.Cynthia@epa.gov]; Haynes, James [haynes.james@epa.gov]
Subject: RE: TD10 - LDAS Biweekly Team Agenda (04/20)

Thanks for the update, Cindy. I'll keep an eye out for any updates on the Aera Energy case in the next few weeks and we'll work on getting a prioritized list of items puled together for the next technical call.

FYI – Shaun's most recent note may affect what we can tackle from a technical perspective, but hopefully he'll be able to shed light on what budget we'll have available. That email was definitely news to me.

Thanks,
Zach Good
he, him, his
ERG - Chemical Engineer

Working Remotely – Ex. 6 Personal Privacy (PP)

From: Schafer, Cynthia <Schafer.Cynthia@epa.gov>
Sent: Wednesday, April 20, 2022 10:10 AM
To: Zachary Good <zachary.good@erg.com>; Haynes, James <haynes.james@epa.gov>
Subject: RE: TD10 - LDAS Biweekly Team Agenda (04/20)

CAUTION: Don't open links or attachments unless you recognize the sender and know they are safe.

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Ex. 7(A)

Ex. 7(A)

Ex. 7(A)

Thank you,
Zach Good
he, him, his
Chemical Engineer

Working Remotely – Ex. 6 Personal Privacy (PP)

US EPA Region 6 – Site-Specific Health and Safety Plan (HASP)

GENERAL INFORMATION

Facility/Site Name:	**Sasol Chemicals (USA) LLC – Lake Charles Chemical Complex**	
Field Start Date *(MM/DD/YYYY):*	01/31/2022	***Field End Date:*** 02/03/2022
Facility/Site Location: (complete address, if relevant)	2201 Old Spanish Trail, Westlake, LA 70669	
General Description of Site Activities:	Inspection - Clean Air Act inspection of ethylene oxide/ethylene glycol production unit	

EMERGENCY INFORMATION

Non-911 Emergency Phone: (Direct to police, fire, hospital and Facility; include area code)	**Police:** 337-433-4151	**Fire:** 337-436-7417
	Hospital: (337) 527-7034	**Facility/Site:** +13374945301
Medical Facilities: (Name and Address)	West Calcasieu Cameron Hospital 701 Cypress St, Sulphur, LA 70663	
Directions to Local Medical Facilities:	(see attached map with directions)	
Site-Specific Emergency Response Procedures:	If serious, call 911. If not, transport to nearest medical facility. Follow site-specific emergency response procedures provided by site personnel prior to entry.	

EPA RESOURCES

	Name	Work Phone	Mobile Phone
Team/Project Leader:	Justin Chen	214-665-2273	Ex. 6 Personal Privacy (PP)
First-Line Supervisor:	James Leathers	214-665-6569	
R6 SHEMP Manager:	Kendra Mask	(214) 665-7225	
Workmen's Comp Manager:	Kendrick Young	(214) 665-7466	---

HAZARDS / SAFETY

Applicable JHA(s):	General Industrial Air Inspection & COVID-19 Supplement

Check Potential Hazards:

☐ Radiation	☑ Toxics	☑ Fire/Explosion	☐ Corrosives
☐ O_2 Deficiency	☑ Noise	☑ Physical	☐ Other:
☐ Dusts	☑ Heat/Cold Stress	☐ Biological	

Site Specific Hazard Description: (i.e. potential hazards, routes of entry, quantity of chemicals present, etc.)	Toxics: inhalation hazards from contaminants in production and tanks Noise: Production generated Heat Stress: extreme temperatures Fire/Explosion: production facility and tanks store flammable material Physical: Tour facility with limited mobility
Safety Monitoring Equipment Required: (list equipment)	EPA will follow the facility's safety equipment requirements. EPA will also use a FLIR infrared camera to detect hydrocarbon emissions from production devices, storage tanks, piping, and loading devices.
Prevention:	*All site safety procedures shall be followed. Areas with potential exposure to chemical, physical and explosive hazards shall be avoided if at all possible. Team members shall not enter confined spaces or areas with potential unexploded ordinance. In case of emergency, all inspection staff shall exit and allow site personnel to contain and manage incident.*
Safety Supplies:	Reference attached JHA

Facility/Site Name:	Sasol Chemicals (USA) LLC – Lake Charles Chemical Complex		
Field Start Date:	01/31/2022	***Field End Date:***	02/03/2022

HASP Approval / H&S Certification

This site HASP has been reviewed and constitutes the minimum anticipated safety requirements for personnel engaged in field activities at this project site. NOTE: THE HASP HAS TO BE COMPLETE WITH ATTACHMENTS BEFORE SIGNING.

By signing below, I certify that I have read and understand the JHA applicable to this HASP, have completed all required health and safety training, and possess all required personal protective equipment.

Team and/or Project Leader/ Cell Phone Number	*Signature/ Date:*
Justin Chen / 469-544-8709	JUSTIN CHEN Digitally signed by JUSTIN CHEN DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=JUSTIN CHEN, 0.9.2342.19200300.100.1.1=68001003655847 Date: 2022.01.18 07:22:06 -06'00'

Team Member(s) / Cell Phone Number	*Signature/ Date:*	***Team Member(s) / Cell Phone Number***	*Signature/ Date:*
/		/	
/		/	
/		/	
/		/	
/		/	
/		/	
/		/	
/		/	

By signing below, I certify that I have read and approved this HASP, and have confirmed the team listed above are all current in their H&S training/programmatic requirements as defined in their current JHA(s).

First-Line Supervisor: James Leathers	*Signature/ Date:*	Leathers, James Digitally signed by Leathers, James DN: cn=Leathers, James, email=Leathers.James@epa.gov Date: 2022.01.18 17:15:22 -06'00'
Health & Safety Officer: Kendra Mask	*Signature/ Date:*	KENDRA MASK Digitally signed by KENDRA MASK DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=KENDRA MASK, 0.9.2342.19200300.100.1.1=68001003655744 Date: 2022.01.19 14:09:43 -06'00'

NOTE: ***After approval of the HASP and before departing to the field, the project leader must email a signed PDF copy to each of his/her TEAM MEMBER(s), FIRST-LINE SUPERVISOR, and the SHEMP MANAGER. The project leader must carry and maintain a signed hardcopy in the field and have it accessible for all team members.***

☐ ***HASP DISAPPROVED*** ***For Health & Safety Officer Use Only***

HASP Disapproved

Deficient Area(s): ☐ *HASP Error* ☐ *Training Error* ☐ *Programmatic Error*		
Health & Safety Officer: Kendra Mask	*Signature:*	*Date:*

JOB HAZARD ANALYSIS

Hazard (HT)		Job Task:
1. Toxic Chemic	15. Fall (Slips/Trips)	**General Industrial Air Inspections**
2. Flammable Chemicals	16. Fall (To a Different Level)	
3. Corrosive Chemicals	17. Excavation (Collapse)	
4. Environmental	18. Fire, Heat, Thermal, Cold	
5. Explosion (Chemical Reaction)	19. Noise	
6. Explosion (Over pressurization)	20. Radiation (Ionizing/Non-Ionizing)	
7. Mechanical/Vibration	21. Visibility	
8. Electrical (Shock, Short Circuit)	22. Weather	
9. Electrical (Fire)	23. Caught (In, On, Between)	
10.Electrical (Static, ESD)	24. Struck (By, Against)	
11.Electrical (Loss of Power)	25. Driving	
12.Ergonomic (Overexertion)	26. Confined Space	
13. Ergonomic (Human Error)	27. Other	
14. Vibration		

Job Frequency/ Duration:
20/year; 1-5 days/site; may conduct several site inspections during one trip

Tools Used:
Digital Camera
FLIR Camera
Portable VOC Detector
Cell Phone
Portable Toxic Vapor Analyzer (borrowed from 6SF)

Chemicals Used:
Span gases for calibration – 10 lb or smaller compressed gas cylinders

CRITICAL TO SAFETY (CTS)

Risk Estimation Matrix

Probability of Occurrence of Harm	SEVERITY OF HARM			
	Catastrophic	Serious	Moderate	Minor
VERY LIKELY	Extreme	High	High	Medium
LIKELY	High	High	Medium	Low
UNLIKELY	Medium	Medium	Low	Negligible
REMOTE	Low	Low	Negligible	Negligible

* High = CTS tasks should receive engineering controls prior to assigning administrative or PPE controls.

FLIR = Forward Looking Infrared
VOC = Volatile organic compound
PPE = Personal protective equipment
MSDS = Material Safety Data Sheet

Job Description: Personnel conduct site inspections at various industrial facilities to determine compliance with federal emission standards, Title V Operating Permits, or Synthetic Minor Operating Permits. Personnel may scan various units using the FLIR camera to determine if leaks/plumes are present. If leaks are observed, personnel approach the unit from upwind to limit potential inhalation exposures. VOC detectors and toxic vapor analyzers may be utilized to confirm presence of certain types of emissions at the source. VOC detectors and vapor analyzers require periodic calibration using standard gases which come in small compressed gas cylinders. Inspections encompass indoor and outdoor site conditions, and include visual observations of operating and non-operating industrial machinery and equipment.

Step #	Procedures (LOP Procedure Step)	Potential Hazards	HT	Check CTS	Required Safe Practice	PPE
1	Pre-inspection: Collect and review available site information and records, coordinate travel, and develop site safety plan.	None	NA	NA	Consider anticipated weather conditions and potential hazards, and determine appropriate attire	NA
2	Deployment: Organize personnel/equipment/supplies; Conduct pre-inspection meeting at Regional Office (RO); Deploy to location either by car or airplane (personnel drive the majority of times).	Ergonomics, Driving, Weather	13, 15, 21, 22, 24, 25, 27	Medium	Careful lifting techniques; situational awareness of wet or uneven ground; secure grip; packing at desk level or higher; drive defensivly; do not text while driving; do not use phone while driving (passenger makes calls or move off road and stop)	Other Body Protection
3	Calibrate Instruments: Prior to site entry, personnel calibrate portable or hand-held VOC detector or toxic vapor analyzer, if such are to be used (conducted off-site to avoid cross contamination). If no portable detectors or analyzers will be used, proceed to step 4.	Pressurized gas cylinders	2, 27	Low	Follow instrument manual instructions and calibration gas MSDSs for proper handling of span gases during detector calibration	NA
4	Site Entry and Observation: Personnel may be requested to complete a short (<30 minutes) on-site facility-specific safety briefing before conducting an opening meeting. In the opening meeting, site-specific documentation, facility layout drawings, diagrams, reports, records and other data are requested for cursory review. Personnel then observe and inspect facility operations following the process flow throughout the site, both inside and outside. Special attention is given to process equipment, tanks, pollution control equipment, piping, drains, storage areas, and treatment systems. Personnel may scan	Poisonous insects or plants, chemicals, thermal/cold stress, noise, vibration, slips/trips/falls, severe weather, operational and/or moving heavy equipment and vehicles, pressurized/cryogenic	1-4, 6, 7, 14, 15, 18, 19, 20, 21, 22, 27	Low	Reference PPE Recommendations table and PPE Hazard Assessment Form	

	v[illegible] piping, or tanks with the FLIR camera from a distance e[illegible] closer from an upwind direction. If unauthorized e[illegible]ons are noted, personnel document the deficiencies using the FLIR camera, a digital camera, and the VOC detector or toxic gas analyzer. At the conclusion of the site inspection, personnel conduct a closing meeting to communicate deficiencies, identify additional information needs, or request follow up actions.	bulk gas storage ves[illegible] hazardous material storage vessels, hig[illegible] pressure liquid or gas piping systems, non-ionizing radiation from industrial lasers, dust and smoke, noxious odors				
5	Deployment to Next Location: If applicable, personnel drive to next industrial facility and repeat steps 3 & 4 above. If not, personnel proceed to step 6.	Reference Steps 3 & 4				
6	Post-Inspection Return: Upon completion of inspection visit(s), return to RO and proceed with post inspection activities (administrative in nature).	Ergonomics, Driving, Weather	13, 15, 21, 22, 24, 25, 27	Medium	Careful lifting techniques; situational awareness of wet or uneven ground; secure grip; packing at desk level or higher; drive defensively; do not text while driving; do not use phone while driving (passenger makes calls or move off road and stop)	Other Body Protection

HAZAR… ALL POTENTIAL HAZARDS ASSOCIATED WITH THE JOB (CHECK ALL THAT AP…

Physi…						
General	☒	heat	☒	cold	☒	noise
	☒	explosion	☒	fire	☒	weather
	☐	fatigue	☐	violence	☒	illness/injury
Radiation	☐	ionizing	☐	microwave	☐	light
Vehicles	☒	traffic	☒	heavy equip	☒	forklift
	☐	helicopter	☐	small aircraft	☐	boat
Boat Ops	☐	sediment sampling	☐	rapid water	☐	open water
	☐	diving	☐	electrofish		
Industrial	☒	comp gas	☒	electricity	☐	confined space
	☒	equip	☒	moving parts		
Overhead	☐	obstruction	☒	falling objects		
Elevation	☒	roof	☒	scaffold	☒	ladder
	☒	stairs	☒	catwalk		
Slips/trips	☒	terrain	☒	debris	☒	slippery
	☐	trench	☒	pits/holes		
Other physical hazards:			☒	Noxious odors, pressurized vessels, vibration, non-ionizing radiation (lasers)		

…logical						
Agriculture	☐	CAFO	☐	fish	☐	farm anim…
Animals	☒	dogs	☒	feral animals	☒	snakes
Insects	☒	spiders	☒	mosquitoes	☒	wasp/hornet
	☒	bees				
Pathogens	☐	bloodborne	☐	sewage	☐	med/lab
Other Biological:	☒	scorpions, poisonous plants				

Chemical						
Containers	☒	ammonia	☒	chlorine	☒	other
VOCs	☒	solvents	☒	fuel	☒	oils
Wastes and other materials	☐	sewer	☐	landfill	☒	smoke/dust/fume
	☒	metals	☐	PCBs	☒	paints/surfacing
Particulates	☒	fibers	☒	diesel	☐	asbestos
Sampling	☐	acids	☐	bases		
Other Chemicals:	☒	benzene, toluene, ethylbenzene, xylene, sulfides, CO_2, liquid natural gas, methane, ethane, amine solutions, inert/cryogenic bulk gases, inorganic acids and alkalis, chlorofluorocarbons, organic corrosives, etc				

REQUIRED PERSONAL PROTECTIVE EQUIPMENT (PPE) (CHECK ALL THAT APPLY)

Feet:	☐	safety boots	☒	steel-toe boots	☐	shank
	☐	rubber boots	☐	waders		
Gloves:	☒	leather	☐	cotton	☐	cut-resistant
	☐	chemical resist	☐	disposable		
Body:	☐	safety vest	☐	pfd	☐	harness
	☐	tyvek	☒	flame retardant	☐	coveralls
Eyes:	☒	safety glasses	☒	sunglasses	☐	goggles
Head:	☒	hard hat	☒	hearing protection	☒	respirator

OTHER REQUIRED SAFETY EQUIPMENT/TRAINING

☐	dosimetry	☒	communication	☐	decontamination
☒	first aid kit	☐	fire extinguish	☐	flares
☐	chains/studs	☒	eye wash/shower		

☐	24 hr HAZWOPER	☐	40 hr HAZWOPER	☐	HAZWOPER Annual Refresher
☐	TLD Program	☒	RPP Program	☒	Medical Surveillance
☒	1st Aid/CPR	☒	Other: 1) 24hr EPA H&S Training; 2) 8hr EPA H&S Refresher; 3) Defensive Driving Training (every 3yrs); 4) Respirator Fit test/training		

COMMENTS:

Personnel may be potentially exposed to various chemicals while inspecting process equipment, piping, storage areas, pollution control devices, tanks, and treatment systems. Chemicals may include, but are not limited to: organic chlorinated and non-chlorinated solvents; bulk flammable, combustible, toxic/corrosive, or inert/cryogenic gases; petroleum fuels; petroleum and non-petroleum oil substances; chlorofluorocarbons, inorganic acid and alkaline liquids; metallic and non-metallic mineral solids; and, organic corrosives. Air sampling data is usually not available to document potential inhalation exposures, so personnel should minimize time spent in areas where hazardous materials are stored or used. Physical hazards may include loud noise, dust, smoke, and vibration from heavy equipment and machinery, noxious odors, forklift and other vehicular traffic, and occasionally, non-ionizing radiation from industrial lasers. Personnel may be exposed to hazardous noise levels at or above 85 dBA, and are required to wear ear plugs and/or muffs while observing or inspecting areas with hazardous noise. Sources of hazardous noise may also generate noticeable vibration. Such sources include heavy equipment and machinery, and large motors, compressors and pumps which may be located in semi-enclosed structures. Personnel may be exposed to smoke, dust and fumes from material stockpiles, moving and handling equipment, and process equipment. When such conditions are anticipated, personnel are advised to stay upwind of these sources. Outdoor inspections may occur during all types of weather conditions, including extreme heat, cold, or high wind. Thermal stress is the most serious potential hazard; therefore, personnel must ensure adequate hydration and wear appropriate attire and field gear when conducting outdoor site inspections. Inspection acitivies may be conducted on various terrains and in remote locations where pits, holes, and trenches may be encountered. Poisonous insects, plants, and snakes may be present. Personnel should be aware of their surroundings and take evasive actions to avoid contact with such hazards. For inspections where air monitoring is conducted, personnel are required to wear full-face respirators when in close proximity to air emission sources. Although personnel approach these sources from upwind, the wind direction could change at any time and potential inhalation hazards may be present. **REFER TO PPE HAZARD ASSESSMENT FORM FOR SPECIFIC EXPLANATION OF HAZARDS ASSOCIATED WITH THIS JOB HAZARD ANALYSIS.**

CERTIFICATION OF HAZARD ASSESSMENT

SUPERVISOR:	DATE:	SAFETY/HEALTH REPRESENTATIVE:	DATE:
Margaret Osborne	12-10-14	[signature]	12-9-14

PPE Hazard Assessment Form

HEALTH AND SAFETY HAZARDS		
	mical Hazards	**Description/Mitigation Methods**
	Vapors/gases	Personnel may be potentially exposed to various chemicals while inspecting process equipment, piping, storage areas, pollution control devices, tanks, and treatment systems. Chemicals may include, but are not limited to: organic chlorinated and non-chlorinated solvents; bulk flammable, combustible, toxic/corrosive, or inert/cryogenic gases; petroleum fuels; petroleum and non-petroleum oil substances; inorganic acid and alkaline liquids; metallic and non-metallic mineral solids; and, organic corrosives.
X	Dusts/mists/fumes	Personnel may be exposed to smoke, dust and fumes from material stockpiles, moving and handling equipment, and process equipment.
X	Liquid splash	Same as for vapor/gases
X	Other	Physical hazards may include loud noise, dust, smoke, and vibration from heavy equipment and machinery, noxious odors, forklift and other vehicular traffic, and occasionally, non-ionizing radiation from industrial lasers.
Comments: (potential hazards associated with air monitoring)	Personnel may scan emission sources using the FLIR camera to determine if leaks/plumes are present. If leaks are observed, personnel approach the unit from upwind to limit potential inhalation exposures. VOC sensors and/or toxic vapor analyzers (Photoionization Detectors) are to be carried into the field and used whenever the inspector has knowledge, based on their best professional judgment or when so advised by the SHEMP manager, that monitoring may be needed. This prior knowledge of potential contaminants should be obtained by a thorough review of the following prior to site entry: 1. Previous case history of the site from previous EPA inspections 2. Knowledge obtained from interviewing other inspectors who had gone to this site 3. SIC code lookups 4. Company history on either the EPA site or Industry internet search 5. Past EPCRA reporting 6. Companies that have a history of past releases 7. Chemical inventories obtained from the company 8. Industrial hygiene data obtained from the company. If exposures are expected at any time that would be ½ of the TLV or PEL (whatever is more conservative) or if monitoring equipment (carried into the field) indicates exposures at greater than or equal to this "action limit", then the inspector is required to don their full-face air purifying respirator, with chemical-specific cartridges, during the inspection or evacuate the area immediately.	
	sical Hazards	**Description/Mitigation Methods**
X	Ergonomics	Personnel may experience repetitive motion or prolonged awkward positions during observations. Additional tasks during monitoring may include infrequent lifting, pushing, pulling, or carrying of heavy objects. Vibration, heat or cold may add risk to these work conditions. The level of risk depends on the intensity, frequency, and duration of the exposure to these conditions. Breaks at regular intervals, careful lifting techniques, secure grip on equipment items, and packing at desk level or higher will reduce potential exposure risk.
X	Heat —high temperatures	Employees engage in field activities during all types of weather conditions, including extreme heat. Thermal stress is the most prevalent potential hazard. Personnel must ensure adequate hydration and wear appropriate field gear while engaging in inspection activities. Other potential sources of heat hazards include areas where welding, metal fabrication, or metal melting occurs, heated storage vessels, steam lines, and combustion exhausts ducts.
X	Cold —cold temperatures	Employees engage in field activities during all types of weather conditions, including extreme cold. Although inspections are typically performed in temperate climates, exposure to freezing cold may be a potential hazard. Therefore personnel must ensure adequate hydration and appropriate field gear (layers, protecting the extremities especially fingers, toes, nose, and ears) is worn while engaging in emergency response activities. Personnel should be trained on the signs and symptoms of frost bite and hypothermia and understand corrective measures to take.
X	Fire	Due to the nature of industrial facilities, potential fire or explosions hazards are possible. Personnel should follow site-specific fire safety and emergency response procedures for evacuation as the situation dictates. In addition, EPA staff should always accompanied by site personnel.
X	Electricity	Industrial sites have various electrical systems. Employees may be exposed to potential electrical hazards during inspection activities, depending upon the type of facility equipment and processes. Personnel should adhere to site-specific safety measures to avoid electrical hazards as the situation dictates. Maintain a safe distance from all electrical components. If exposed lines are present, do not touch any metal objects/equipment nor stand in nearby pools/puddles of water. In addition, EPA staff should always accompanied by site personnel.
X	Radiation — ionizing, non-ionizing	Personnel may occasionally inspect facilities where potentially hazardous industrial lasers are used for specific purposes, such as thickness gauging, distance measurement, cutting, or penetration. Such devices typically are shielded and have warning symbols posted. Damage to eyes or local skin burns are the potential hazards. Personnel should maintain adequate distance from industrial lasers in accordance with site specific safety procedures and direction by site personnel.
X	Noise and vibration	Personnel may be routinely exposed to hazardous noise levels above 85 dB during site inspections. Sources of hazardous noise may also generate noticeable vibration. Such sources include heavy equipment and machinery, and large motors, compressors and pumps which may be located in semi-enclosed structures. Employees are required to wear ear plugs and/or muffs when conducting inspection activities around hazardous noise sources. Employees should minimize time spent in areas with high vibration levels to avoid symptoms of motion sickness or dizziness.

PPE Hazard Assessment Form

HEALTH AND SAFETY HAZARDS		
X	Slips/Trips/Falls	Slips/trips/falls are always likely when walking walking through an industrial plant. In addition, many of the field acitivies are conducted outside where pits, holes, and various terrains are encountered. Personnel need to be cognizant of their surroundings, utilize steel-toed boots with sufficient tread, and take evasive actions to avoid contact with such hazards.
X	Elevation - Falls	Personnel may climb stairways or enter catwalks to access tanks, vessels and equipment higher than ground level to observe and inspect the condition of such sources. Personnel should exercise caution when climbing ladders or stairways, and ensure that these are equipped with approriate handrails and other safeguards. Personnel must inspect stairways/walkways to ensure structural integrity and/or question site personnel regarding structural stability prior to climbing. Personnel are not to climb ladders.
X	Other	Vehicle accidents and traffic are potential hazards encountered while driving to and from, and walking within, large industrial facilities. Personnel are required to take Defensive Driving Training every 3yrs, and should be cognizant of internal and external vehicle traffic (e.g. forklifts, golf carts, earth-movers, 18-wheek trucks etc) when moving throughout an industrial site during inspections.
Biological Hazards		**Description/Mitigation Methods**
X	Animals/Insects	Employees may encounter poisonous insects and snakes in outdoor locations during site inspections. Personnel need to be cognizant of their surroundings and take evasive actions to avoid contact with such hazards. Wearing long sleeves and other protective clothing is recommended when such outdoor conditions are anticipated to reduce potential exposures.
X	Other	Employees conducting inspections in outdoor locations may encounter poison ivy and other poisonous plants. Personnel must be trained to recognize common poisonous plants. In the field, employees should be aware of their surroundings, and evade areas which may have poisonous plants to prevent injury/illness. Cut-resistant gloves, long sleeves and other protective clothing are recommended when such outdoor conditions are anticipated to reduce potential exposures.

Completed by: Kendra Gomez & Diana Lundelius **Date:** May 19, 2011
Updated by: Kendra Mask **Date:** December 19, 2019
SHEMP Review KendraMask **Date:** 12/19/19

Required Personal Protective Equipment (PPE)

Where engineering and administrative controls are not feasible or sufficient for controlling hazards, PPE must be used to protect workers. The following PPE is required for the noted tasks above:

Eye and Face Protection			
X	Safety glasses with side shields		Reflective goggles/face shield
	Chemical splash goggles		Cutting/brazing/welding eye protection
	Face shield	X	Other: Sunglasses
Head Protection			
X	Hard hat, bump cap		Helmet, cowl, hood
	Welding helmet/mask		Other:
Foot Protection			
X	Steel-toed safety boots		Other:
	Chemical-resistant boots		
Body Protection			
	Apron (splash, work)		Head-reflective garments
	Lab coat		Sleeves (cut-resistant)
X	Coveralls (work, chemical-resistant) Hazard Type: Fire Type coverall: Nomex	X	Other: Appropriate field gear for the weather (thermal/cold stress), long sleeves and other protective clothing if poisonous insects/snakes/plants may be encountered
Respiratory Protection			
X	Respirator (situational dependant)	X	Type of respirator: Full-Face with GMC-H cartridges
Hand Protection			
	Rubber insulating gloves		Rubber insulating sleeves
	Rubber insulating hoods	X	Other: Leather Work Gloves

Other:

Ear plugs and/or muffs

Sunscreen (*personal issue item)*

Insect repellent (*personal issue item)*

Personnel are not authorized to wear contact lenses during inspections due to potential reaction with chemical vapors. Prescription safety glasses are available through the R6 Health & Safety Office.

HEALTH & SAFETY TRAINING REQUIREMENTS

EPA employees (without HAZWOPER training) must have at a **minimum** the following:

Course Name	Training Location	Training Frequency
24hr EPA H&S Training for Field Activities (OTH 952)	FedTalent	Initial – One time
8hr EPA H&S Training for Field Activities Refresher (OTH 952) that includes the following modules: • EPA's Occupational Health and Safety Program • Planning and Preparation for Field Activities • Hazard Communication • Chemical Hazards & Reactions • Basic Toxicology • Occupational Noise • Heat and Cold Stress • Human Factors/ Ergonomics • Natural Hazards • Personal Protective Clothing and Equipment • Ladders & Climbing	FedTalent	Annual
Defensive Driving	GSA Website	Every 3yrs
First Aid/CPR	In-Class	Every 2yrs
Respirator Fit Test & Training	SHEMP Manager	Annually

EPA employees who **maintain HAZWOPER certification** are required to have the following:

Course Name	Training Location	Training Frequency
24/40 hr HAZWOPER Training	In-Class	Initial – One time
8hr HAZWOPER Refresher	In-Class	Annual
Defensive Driving	GSA Website	Every 3yrs
First Aid/CPR	In-Class	Every 2yrs
Respirator Fit Test & Training	SHEMP Manager	Annually

OCCUPATIONAL MEDICAL SURVEILLANCE PROGRAM

All employees under this JHA will be assigned to the Clean Air Act Inspector/Enforcement Officer Work Order (040).

GENERAL INDUSTRIAL AIR INSPECTIONS

I HAVE READ OR BEEN BRIEFED ON THE HAZARDS AND PROTECTIVE MEASURES IDENTIFIED FOR THE ABOVE-LISTED TASKS AND FULLY UNDERSTAND THE JOB-SPECIFIC REQUIREMENTS THAT HAVE BEEN ESTABLISHED.

DATE	EMPLOYEE NAME	EMPLOYEE SIGNATURE	EMPLOYER NAME
12/10/14	Greg Valentine		R6 U.S. EPA KCG 6/6/17
12/10/14	Charles W Hendrick		R6 EPA LEA Agency 12/15 KCG
12-10-14	DIANA LUNDELIUS		R6 EPA
12/10/2014	Cynthia J Kaleri		R6 EPA
12/10/2014	JOHN L JONES		R6 EPA GEN-AA KCG 6/6/17
12/10/2014	RAYMOND MAGYAR		R6 EPA-AA KCG 6/12/17
12/10/14	Donald M Smith		R6 EPA KCG 6/6/17
12/10/14	Samuel Tates		R6 EPA
12/10/14	David Eppler		R6 EPA KCG 1/6/15
2/11/14	Tony Robledo		R6 EPA
12/11/14	Dorothy Crawford		R6 EPA GEN KCG 1/20/16
12/11/14	Clint Rachal		EPA R6 KCG 6/6/17
12/16/14	Emad Shahin		EPA - R6
12/16/14			
12/16/14	Lawrence Craig Lute		EPA R6 KCG 6/6/17
12/16/14	James Leathers		EPA - R6
12-16-14	Dominique Duplechain		R6 EPA LEA Agency 12/15 KCG
12/16/14	DEBBIE FORD		EPA - R6
05/04/15	Mark Steed		EPA - R6 KCG 11/12/16
11/5/15	Sarah Frey		EPA - R6
11-5-15	Lisa Schaub		EPA R6 KCG 11/8/17
11-5-15	Justin Owen		EPA R6
11-5-15	Bridget Weir		EPA R6

GENERAL INDUSTRIAL AIR INSPECTIONS

I HAVE READ OR BEEN BRIEFED ON THE HAZARDS AND PROTECTIVE MEASURES IDENTIFIED FOR THE ABOVE-LISTED TASKS AND FULLY UNDERSTAND THE JOB-SPECIFIC REQUIREMENTS THAT HAVE BEEN ESTABLISHED.

DATE	EMPLOYEE NAME	EMPLOYEE SIGNATURE	EMPLOYER NAME
11/12/15	PRINCE NTODZO		EPA R6
11/16/15	Brandon Bammel		EPA R6
12/10/15	Kevin J. Kim		EPA R6
12/01/14/16	Kayla Buchanan		EPA R6
10/13/16	James Haynes		EPA R6
11/19/19	Aimee Ross		EPA R6
01/15/20	Ben Rosenthal		EPA R6
7/20/2021	Jamie Salabogi		EPA R6
08/26/2021	Colleen McCarthy		EPA R6
08/27/2021	Daniel Williams		EPA R6

GENERAL INDUSTRIAL AIR INSPECTIONS

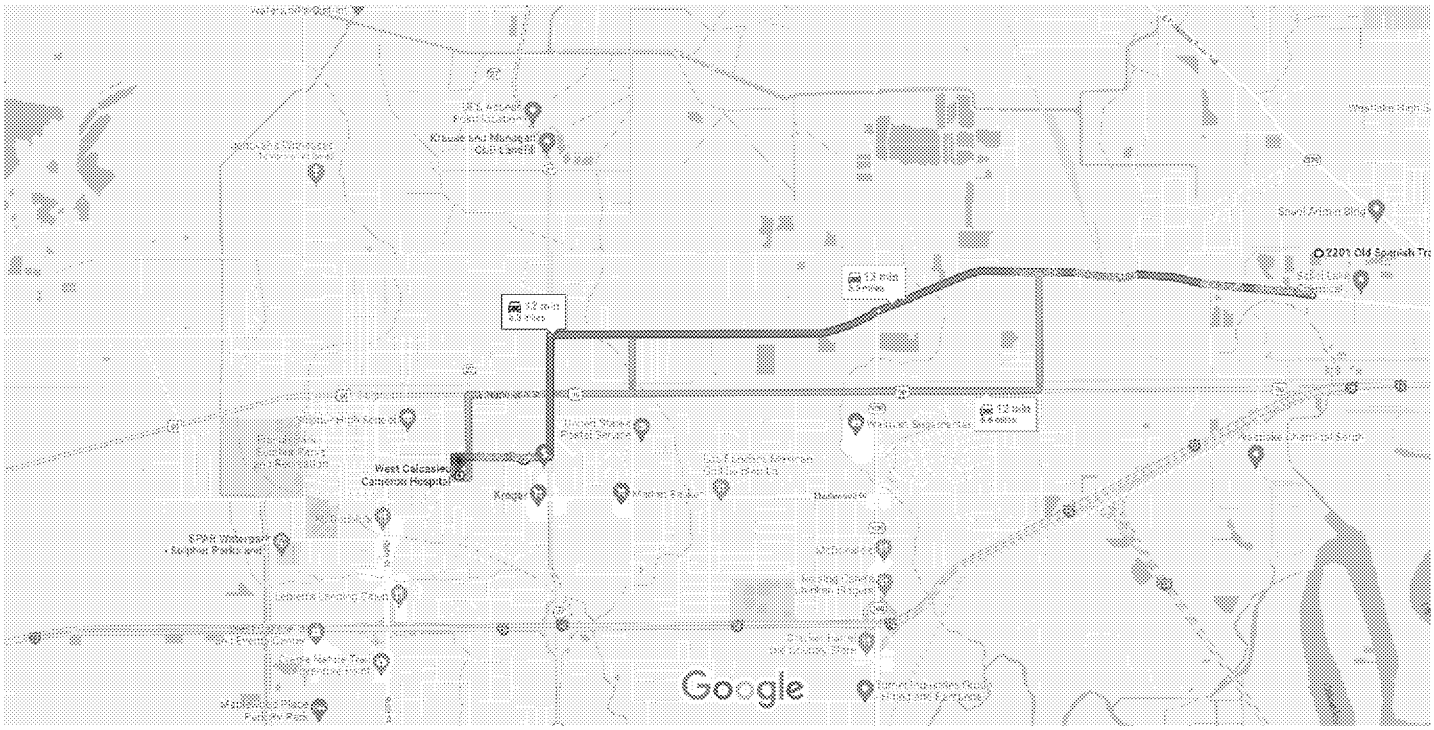
I HAVE BEEN INSTRUCTED IN THE HAZARDS AND PROTECTIVE MEASURES REQUIRED FOR THE ABOVE LISTED TASKS AND TOOLS. I UNDERSTAND THAT FAILURE TO FOLLOW THESE INSTRUCTIONS MAY RESULT IN DISCIPLINARY ACTION.

DATE	EMPLOYEE NAME	EMPLOYEE SIGNATURE	EMPLOYER NAME
11/12/15	PRINCE NFODZO		EPA R6
11/16/15	Brandon Bammel		EPA R6
12/10/15	Kevin J. Kim		EPA R6
~~12/01/14~~ 1/14/16	Kayla Buchanan		EPA R6
10/13/16	James Haynes		EPA R6
6/6/17	Jim Gold		EPA R6

Google Maps

2201 Old Spanish Trail, Westlake, LA 70669 to West Calcasieu Cameron Hospital

Drive 6.3 miles, 12 min



Map data ©2022 2000 ft

2201 Old Spanish Trail
Westlake, LA 70669

Drive from E Burton St/Old Spanish Trail to Sulphur

11 min (6.2 mi)

1. Head west on E Burton St/Old Spanish Trail toward Trousdale Rd

2.7 mi

2. At the traffic circle, take the 2nd exit and stay on E Burton St/Old Spanish Trail

2.1 mi

3. Turn left onto N Beglis Pkwy

0.8 mi

4. Turn right onto Cypress St

0.1 mi

5. Continue onto Loretto Ave

226 ft

6. Turn right onto Cypress St

0.4 mi

Drive to your destination

1 min (0.1 mi)

7. Turn left

0.1 mi

8. Turn left

Destination will be on the right

141 ft

West Calcasieu Cameron Hospital
701 Cypress St, Sulphur, LA 70663

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.

EPA COVID-19 Job Hazard Analysis (JHA) Supplement, July 6, 2020, Final

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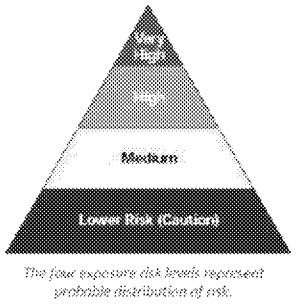
1. Introduction

- The COVID-19 Public Health Emergency is very dynamic. Federal, state and local government guidance is updated frequently. There may be new CDC, OSHA or EPA guidance that will impact the current content of this JHA prior to the next update. As a result, *it is important to review the government links in this JHA for new information*. Additionally, due to possible differences in state or local health department requirements on COVID-19, the employee, supervisor and the SHEMP manager should review applicable state/local requirements before traveling and deployment to a site. These state/local requirements may be more flexible for essential workers that are traveling into the area, and EPA travel for field work may qualify as such essential travel.
- Prior to travel, assess the prevalence for COVID-19 cases in the area(s) you are traveling to (and through) in addition to where you will be performing site work. This assessment should include evaluation of whether the area has demonstrated a downward trajectory of positive tests and documented cases within a 14-day period. Including this will help staff determine how to "assess the prevalence.".
- Specific COVID-19 information can be found on state/territorial/local government and health department websites. Available sources include the CDC COVID-19 Tracker, Johns Hopkins University Coronavirus Resource Center[1], the COVID Tracking Project[1] , the U.S. Census Bureau's Coronavirus (COVID-19) Pandemic Site and other expert sources. EPA also developed the EPA Facility Status Dashboard aid in facility reopening decisions. The Dashboard provides information on the status of each gating criterion in the commuting area surrounding our facility locations.
- Employees in consultation with their supervisor and SHEMP manager should use this JHA Supplement as a template to address COVID-19 health concerns. The Agency recommends this JHA Supplement be used for all field work until such time that the COVID-19 public health emergency is over.

2. OSHA Worker Exposure Risk to COVID-19, Summary

[1] Non-federal sites are included for informational purposes only and do not constitute any endorsement by EPA or its employees.

OSHA Guidance on Preparing Workplaces for COVID-19 provides four COVID-19 exposure risk categories. The use of the term "workers" below includes EPA field staff that are on location or in transit to facilities/sites or field locations.:



Occupational Risk Pyramid for COVID-19

- **Very High Exposure Risk**
  - Very high exposure risk jobs are those with high potential for exposure to known or suspected sources of COVID-19 during specific medical, postmortem, or laboratory procedures.
  - Workers in this category include:
    - Healthcare workers (e.g., doctors, nurses, dentists, paramedics, emergency medical technicians) performing aerosol-generating procedures on known or suspected COVID-19 patients.
    - Healthcare or laboratory personnel collecting or handling specimens from known or suspected COVID-19 patients (e.g., manipulating cultures from known or suspected COVID-19 patients).
    - Morgue workers performing autopsies, which generally involve aerosol-generating procedures, on the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death.
  - Personal Protective Equipment (PPE):
    - Most workers at very high exposure risk likely need to wear gloves, a protective suit, a face shield or goggles, and either a face mask or a respirator, depending on their job tasks and exposure risks.
    - Those who work closely with (either in contact with or within six feet of) people known to be, or suspected of being infected with COVID-19, should wear respirators.

- **High Exposure Risk**
  - High exposure risk jobs are those with high potential for exposure to known or suspected sources of COVID-19.
  - Workers in this category include:
    - Healthcare delivery and support staff (e.g., doctors, nurses, and other hospital staff who must enter patients' rooms) exposed to known or suspected COVID-19 patients.
    - Medical transport workers (e.g., ambulance vehicle operators) moving known or suspected COVID-19 patients in enclosed vehicles.
    - Mortuary workers involved in preparing (e.g., for burial or cremation) the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death.
  - Heightened Engineering Controls, Administrative Controls and Safe Work Practices Recommended (Discuss with SHEMP Manager)
  - PPE:

- Most workers at high exposure risk need to wear gloves, a protective suit, a face shield or goggles, and either a disposable surgical mask or a respirator, depending on their job tasks and exposure risks.
- Those who work closely with (either in contact with or within 6 feet of) people known to be, or suspected of being, infected with COVID-19 and **should wear assigned respirators**.

- **Medium Exposure Risk**
  - Medium exposure risk jobs include those that require frequent and/or close contact with (i.e., within six feet of) people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients. In areas without ongoing community transmission, workers in this risk group may have frequent contact with travelers who may return from locations with widespread COVID-19 transmission. In areas where there is ongoing community transmission, workers in this category may have contact with the general public (e.g., in schools, high-population-density work environments, and some high-volume retail settings).
  - Engineering Controls - Install physical barriers, such as clear plastic sneeze guards, where feasible.
    - Administrative Controls: Consider offering disposable surgical masks to ill employees to contain respiratory secretions until they are able leave the workplace (i.e., for medical evaluation/care or to return home).
    - Where appropriate, limit public's access to the worksite, or restrict access to only certain workplace areas.
    - Consider strategies to minimize face-to-face contact (e.g., drive-through windows, phone-based communication, telework).
  - PPE:
    - Workers with medium exposure risk may need to wear some combination of gloves, protective suit, a disposable surgical mask, and/or a face shield or goggles.
    - PPE ensembles for workers in the medium exposure risk category will vary by work task, the results of the employer's hazard assessment, and the types of exposures workers have on the job.
    - In the event of a shortage of masks, a reusable face shield that can be decontaminated may be an acceptable method of protecting against droplet transmission. Ensure that when using a face shield it covers the entire face (extends to the chin or below and reaches the sides of the face).
  - **Note that a respirator is not recommended for jobs classified at medium risk**, unless it is part of the PPE normally recommended as part of the hazard assessment.

- **Lower Exposure Risk (Caution)**
  - Lower exposure risk (caution) jobs are those that do not require contact with people known to be, or suspected of being, infected with SARS-CoV-2 nor frequent close contact with (i.e., within six feet of) the general public. Workers in this category have minimal occupational contact with the public and other coworkers.
  - Engineering Controls & Administrative Controls

- Additional engineering controls are not recommended for workers in the lower exposure risk group. Employers should ensure that engineering controls, if any, used to protect workers from other job hazards continue to function as intended.
- Monitor public health communications about COVID-19 recommendations and ensure that workers have access to that information. Frequently check the CDC COVID-19 website: www.cdc.gov/coronavirus/2019-ncov.
- Collaborate with workers to designate effective means of communicating important COVID-19 information

o PPE

- Additional PPE is not recommended for workers in the lower exposure risk group.
- Workers should continue to use the PPE, if any, that they would ordinarily use for other job tasks.
- **Note that a respirator is not recommended for jobs classified at low risk,** unless it is part of the PPE normally recommended as part of the hazard assessment.

3. Pre-Travel Considerations

For pending site work, identify individuals who indicate:

a) Feeling well and show no signs of illness.
b) Not exhibiting any COVID-19 symptoms listed by the CDC, including, but not limited to fever, cough, shortness of breath, or difficulty breathing.
c) No contact with known or presumptive COVID-19 positive individual(s) in past 48 hours. Employees who have been in direct contact with a COVID-19 affected person must notify their supervisors.
d) Completed self-quarantine if recent known or suspected exposure to COVID-19 (Follow CDC guidance on discontinuation of isolation).
e) Willing to be onsite for project duration, wear face covering (e.g., cloth face covering, disposable surgical mask) or respirator (when required) and social distance, etc.
f) The employee, supervisor and the SHEMP manager should consider when EPA employees are traveling from a population center with COVID-19 cases to a population/community with fewer cases as part of the hazard assessment. Not only is there a risk of EPA staff becoming exposed to COVID-19 during fieldwork, but EPA employees could transmit COVID-19 to communities that they visit. Since many of the EPA offices are in the largest cities in their Region with COVID-19 cases, EPA staff traveling to other communities could pose a risk to those communities that may outweigh the benefit of the fieldwork. Some state/local governments may impose restrictions on outsiders traveling into their jurisdiction, and EPA staff should comply with those restrictions. The state/local restrictions may be more flexible or not apply to essential work such as EPA field work.

4. EPA COVID-19 JHA Supplement Instructions:

a) Complete all information as requested on the form below, such as supervisor/SHEMP name and signature; date of JHA, JHA number, name of activity, department, location and other information (name of participating employees other than the supervisor).
b) Review the existing JHA for the task, the OSHA COVID-19 risk levels above, and the listed PPE. Check off any that apply to this job's tasks.
c) For task steps considered OSHA Medium, High and Very High risk, list out the basic task steps, the actual COVID-19 hazard, and the projected hazard control (PPE, engineering control, administrative control).
d) Note that some but not all possible hazards are listed at the bottom of the first page, along with some possible controls.
e) Note that under the box containing the checklist of PPE is a section that documents that engineering controls and administrative controls were considered and review this section after completing the rest of the JHA.
f) Make sure to list all feasible engineering and administrative controls being considered. If they are not feasible, list the reason(s).
g) Complete the column for Basic Tasks or Steps for the job being performed. It is not necessary to list minor insignificant steps or non-COVID-19 related hazards (Non-Covid-19 hazards are included in the original JHA).
h) Complete the column for Corrective Action or Hazard Controls for each Task or Step listed. Make sure to list specific control methods such as engineering controls, administrative controls and specific PPE.
i) Consider other additional risk such as working indoors, tight spaces, performing strenuous activity or working in high heat and/or humidity environments.

Points to remember: This is to be used as a supplement to existing JHAs to document important controls for COVID-19 related hazards that may be present during specific work tasks. A supervisor and employee that performs the job should complete this form together; to ensure they agree as to the actual steps involved in this job, in conjunction with the local SHEMP Manager.

5. EPA COVID-19 Job Hazard Analysis (JHA) Supplement - Template

	Job Hazard Analysis (JHA) **COVID-19 Supplement**	**Supervisor Name:**	James Leathers
		Supervisor Signature:	Leathers, James Digitally signed by Leathers, James DN: cn=Leathers, James, email=Leathers.James@epa.gov Date: 2022.01.18 17:14:52 -06'00'
		SHEMP Manager Name:	Kendra Mask
		SHEMP Manager Signature:	KENDRA MASK Digitally signed by KENDRA MASK DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=KENDRA MASK, 0.9.2342.19200300.100.1.1=68001003655744 Date: 2022.01.19 14:10:54 -06'00'
		Date: 1.18.22	1/19/2022
Job/Activity Name: COVID-19 Supplement – Attach the job specific JHA used for the job task to this supplemental JHA to document the OSHA risk level provided below for the job.		**JHA #:** COVID Supplement to existing JHA (please attach) General Industrial Air Inspection	
Division/Branch: CAED/Air Enforcement	**Area /Location(s)**: 2201 Old Spanish Trail, Westlake, LA 70669 Medium Risk	**Other Information** (JHA participating employees): Justin Chen	

REQUIRED PERSONAL PROTECTIVE EQUIPMENT FOR ENTIRE JOB

☒ Appropriate Basic PPE (Safety glasses, safety shoes, hard hat, gloves) See Attached JHA

☐ Safety glasses	☐ Respirator, Type _____	☐ Welding gloves/ leathers	☐ Safety shoes
☐ Goggles	☐ Hard hat	☐ Protective suit	☐ Other rubber boots_____
☐ Face shield	☐ Hearing protection	☐ Lab Coat &/or Apron	☐ Portable GFCI
☐ Disposable surgical mask	☐ Appropriate gloves	☐ Fall protection	☐ High visibility vest
☐ Other_____	☐ Other_____	☐ Other_____	☐ Other_____

Follow the steps outlined in the EPA Self-Assessment to Stop the Spread of COVID-19 tool to make sure employees are not ill or symptomatic. Perform this self-assessment prior to departing and daily before reporting to work.

Always consider Engineering or Administrative Controls before use of PPE. These controls were considered: ☒YES, ☐NO, if not feasible explain why:

Basic Tasks or Steps	Hazards	Corrective Action or Hazard Controls
1. Vehicle Travel	Contact with person infected with COVID-19, potential spread to others (**Note:** Same hazard for all activities)	a) For EPA or rental vehicle, follow EPA Disinfection Guidance (EPA OMS-SSD Vehicle Utilization, Cleaning, and Disinfecting Recommendations 4/27/20). b) Obtain adequate EPA-registered disinfectants and hand sanitizers for duration of project (vehicle disinfection kits) from Regional or Program equipment/supply managers. c) Clean and disinfect "common touch" vehicle surfaces, e.g., door handles, console, touch screen, steering wheel, inside of door, before and after use. Disinfect/sanitize before and after use by new driver. d) For EPA-owned or rental vehicle, document name and date of initial disinfection/sanitization. e) Travel should be limited to one person per vehicle. If the project requires multiple personnel in one vehicle, don cloth face covering or disposable surgical mask, maximize outside air flow and attempt to separate occupants by at least six feet. f) Minimize fuel fill-ups: wear nitrile gloves and use cloth face cover or disposable surgical masks, when within six-feet of another person; if not wearing gloves, use disinfectant wipe on gas station touch screen before and after use.
2. Accommodations		a) Attempt to secure hotel room with an in-room kitchen or microwave oven and refrigerator. b) If an in-room kitchen or in-room microwave/refrigerator is available, purchase groceries once a week and cook meals in the hotel room. c) If in-room facilities are not available, consider meal delivery service, takeout, or curbside pickup. d) Eating inside of restaurants should be avoided. e) Avoid hotel breakfast buffets, bulk serving containers, and shared service items. f) Disinfect own room with an EPA List N approved disinfectant. g) Use "No Housekeeping" sign to limit access to hotel room.
3. Site Work		a) Follow the steps outlined in the EPA Self-Assessment to Stop the Spread of COVID-19 tool or similar questionnaire to make sure employees are not ill or symptomatic. Workers should be directed to contact the Site Supervisor or Safety Officer if they answer yes to any of these questions. Perform this or similar self-assessment daily before reporting to work.

Basic Tasks or Steps	Hazards	Corrective Action or Hazard Controls
Site Work, continued	Contact with person infected with COVID-19, potential spread to others (**Note:** Same hazard for all activities)	b) EPA Site Supervisor or designee has the responsibility for ensuring that personnel with COVID-19 symptoms do not come onsite. c) The Site Safety Officer should make daily observations of COVID-19 safety compliance and consider monitoring response workers for symptoms. d) Use electronic sign-in (spreadsheet, SharePoint site, etc. Avoid use of clipboard and pen). e) Conduct daily health status screening of site personnel (Follow OSHA recordkeeping requirements). f) If screening is performed, include a non-contact temperature check, e.g. forehead thermometer, and seek guidance from a public health department or healthcare professional on how to implement a health status screening and temperature screening program. g) Require face coverings for all indoor and outdoor operations when social distancing cannot be consistently maintained. h) Require face coverings for all outdoor operations where social distancing cannot be consistently maintained. Similar to administrative and engineering controls implement during Level A, B and C PPE use, if the face covering causes a hazard to a worker (e.g. heat and physical stress while performing strenuous work), implement administrative or engineering controls to limit the hazard caused by the face covering. If field activities prevent social distancing (e.g. assisting in donning and doffing of PPE, composite water sampling), use of a cloth face covering is recommended. i) Even when social distancing is maintained, EPA recommends following the respective state or local jurisdiction. j) Site personnel should always routinely carry a small container of hand sanitizer with at least 60% alcohol, a face covering that covers the nose and mouth, and nitrile gloves. k) In indoor residential environments, site personnel cannot control actions of resident(s). Face coverings are required for all work in residential properties. Site personnel should avoid surface contact whenever possible and should wear nitrile gloves. With the permission of residents, site personnel should wipe down all surfaces that were touched by them before departing residence. l) For site work that involves multiple locations, disinfect or replace equipment, PPE, and personal items before moving to next location. m) Do not shake hands. Use other forms of non-contact greeting. n) Avoid touching face.

Basic Tasks or Steps	Hazards	Corrective Action or Hazard Controls
Site Work, continued	Contact with person infected with COVID-19, potential spread to others (**Note:** Same hazard for all activities)	o) Site personnel should be attentive to handwashing upon arrival at the site, after exiting exclusion zone, prior to taking a break, prior to eating lunch, after use of the bathroom, using shared items and upon leaving the site for the day, etc. Encourage adherence to prescribed handwashing guidelines. p) Augment site handwashing equipment. Make sure soap and water handwashing facilities are readily available onsite. Do not rely on hand sanitizer alone. q) Avoid sharing items with others. This includes personal items such as pen and paper. r) When equipment must be shared (e.g., monitoring and sampling equipment), disinfect touch surfaces (following manufacturer's instructions) before providing to other individual for use and wear nitrile gloves. s) Whenever PPE such as protective suits, boots, air-purifying respirators are needed, attempt to don PPE without an attendant. If an attendant is needed, the attendant should wear a face covering and nitrile gloves. t) When trailers are necessary, separate smaller trailers are preferable to single large trailers in order to facilitate separate space and social distancing of personnel. u) When weather permits, store equipment outside to limit confinement of personnel and number of entries and exits from trailers. v) When possible, use Skype, MS Teams or other virtual communications tools to limit personnel meetings. w) Site trailers, command post, port-a-johns, handwash stations, etc. must be cleaned and disinfected with an EPA List N approved disinfectant daily or more frequently with high use, with special attention to common touch points. x) For rental of select items (e.g. port-a-johns), periodic disinfection may be included. When this is not the case, select site personnel will be designated with this responsibility. y) Do not share respirators or cartridges.

Basic Tasks or Steps	Hazards	Corrective Action or Hazard Controls
	Contact with person infected with COVID-19, potential spread to others (**Note:** Same hazard for all activities)	
If recommended actions indicated in this JHA are not being followed on-site, please point out importance of following JHA to non-compliant workers. Report any incidents of non-compliance to the Site Safety Officer and/or Site Supervisor.		

Comments: This JHA is a supplement to the standard JHA that has been previously completed for typical work activities and is to be used to establish the level of COVID-19 risk. This should be used with a site Health and Safety Plan, Field Work Control Plan, Vessel Float Plan, Dive Safety Plan, etc. The level of risk determined by using this form helps to identify if additional protective equipment or work practice controls are needed due to COVID-19 risk.

The inspection is planned as an unannounced inspection. To meet this objective, agreement between EPA R6 Enforcement and EPA's National Enforcement Investigation Center (NEIC) to make a phone call from the parking lot, covering the COVID-19 Screening Questionnaire below, and informing EPA's decision to make entry and conduct an onsite CAA inspection. If responses by the facility cause concern for EPA inspectors, EPA may hand deliver a Document Request or CAA Section 114 Information Request with the Front Gate or Front Office rather than make entry.

Field Facility Screening Questionnaire for Civil Inspections – COVID-19 (as of 5/28/21) (not required before entry for criminal investigations)	
Questions for the facility:	**Facility Response:**
How many employees work at your facility?	
Are staffing and/or operational work hours curtailed or conducted in non-routine shifts due to COVID-19?	
What is the general layout of your facility? Are there areas with limited capacity or limited access due to COVID-19?	
Do employees practice safe social distancing?	
What type/size of facilities do you have to hold meetings with employees? Do you use an enclosed conference room? Do you limit capacity? Are you able to facilitate remote meetings with employees or with EPA for portions of this inspection?	
What policies do you have in place at your facility for COVID-19? Do you require employees to wear masks? If so, what type of mask is required?	
Does the facility allow visitors? **Note:** Federal Agencies and delivery of chemicals/supplies are excluded. Is there a visitor policy related to COVID-19? Note: Requirements for EPA inspectors that are more stringent than those required by other visitors will be considered a denial of access.	
What PPE do you provide employees and require visitors (if allowed) to wear?	
Do you have a dedicated nurse/doctor at the facility?	

Are you regularly testing your employees for COVID-19? Has anyone tested positive? If so, when and how many? What measures did you take after the employee tested positive?	
What cleaning is performed and what supplies do you use?	
Do you have any vaccination requirements for facility employees or visitors? If so, EPA can provide vaccination cards for our inspectors with the DOB blacked out or a letter from our SHEMP with status. Are there any concerns with this documentation? Note: we can ask about general vaccine status for facility employees, but not about specific individuals.	
Do you have any testing requirements? If so, what information is collected for tests, including information on individual inspectors?	
Have you had any COVID-19 cases? Are any currently active at the facility (within the last 2 weeks)? If so, how many?	